

Public Meeting Board Member Lines of Inquiry Recommendation 2014-1, *Emergency Preparedness and Response*

Public Meeting September 26 – 12:35-12:55 pm: Board Members questions Public Record full/corrected responses:

Board Members
Mr. Sean Sullivan (SPS)
Mr. Bruce Hamilton (JBH)
Ms. Joyce Connery (JLC)
Ms. Jessie Roberson (JHR)
Mr. Daniel Santos (DJS)

The staff reviewed and transcribed the following list of questions from the public meeting video. Blue writing indicates the staff's full response to the Board Member's question.

1. **[DJS]** You mentioned that it was your staff opinion that there was inconsistent implementation and inconsistent oversight throughout the complex. Could you give me some examples of facilities or sites to support that statement?

The staff team presented the Board with the staff's observations regarding implementation issues at the Pantex Plant, Savannah River Site, and Los Alamos National Laboratory. The Board subsequently communicated its concerns with implementation issues to the Department of Energy. In addition, the staff has some initial observations that indicate Lawrence Livermore National Laboratory, Sandia National Laboratory, and the Waste Isolation Pilot Plant may have implementation issues.

The only formal review that the staff has done of oversight was at LANL, which resulted in an identified weakness.

2. **[JLC]** My understanding is that there were some aspects of 151.1D that sites can opt out of, and I'd like to know what those specific issues are and what the approval process is for opting out of those specific requirements that are in 151.1D.

DOE Order 151.1D requires headquarters approval for any exemption to the requirements. Sites must get concurrence from the field element manager and obtain the opinion of the Associate Administrator, Office of Emergency Operations. The Program Secretarial Officer or their designee determines the final disposition of the proposed equivalency or exemption.

There are currently no exemptions posted on the directives website, as is required by the order.

3. **[DJS]** Can you describe where some of the current and upcoming staff review focus areas in the area of emergency preparedness are?

In FY2018, the staff plans to conduct a site programmatic review, focused on the implementation of DOE Order 151.1D, *Comprehensive Emergency Management System*. A review is planned at the Savannah River Site and as resources allow at the Waste Isolation Pilot Plant. In addition, the staff plans to conduct ongoing follow-up oversight involving the Pantex Plant for Recommendation 2015-1,

The staff has tentatively planned to provide oversight of exercises at the Y-12 National Security Complex, the Pantex Plant, Los Alamos National Laboratory, the Hanford Site, and the Nevada National Security Site, focused on verifying response proficiency. As sites report their FY2018 exercise schedules and scenarios, the staff team may schedule additional exercise reviews and will adjust the plan based on resource availability.

4. **[JCS]** EA has stated that the new proposed Core Risk Management process no longer requires clear and quantitative expectations for risk management. Can you comment on that?

The staff has not discussed this topic with EA and does not have knowledge of how EA's comments on the order were dispositioned during the revision process. The staff's approach to assessing risk is based on the sites and facilities that have the hazards that could result in consequences to the workers and the public. Per DOE Order 151.1D, sites and facilities are still required to assess their hazards and create an Emergency Planning Hazard Assessment that shows the potential for affects to the public and the workers.

5. **[SPS]** The fact that no new deficiencies were being added to this list [the Deficiency Report] in the last 15 months, does that mean that there haven't been any external assessments at any of these sites? In other words, has the Office of Enterprise Assessments been doing assessments, or did they just do assessments and not find any deficiencies? Or do you not know?

Enterprise Assessments conducted assessments at Lawrence Livermore National Laboratory and the Pantex Plant in the last year. DOE provided the original deficiency report to the Board on May 10, 2016. The Board staff subsequently requested and received one update, dated March 24, 2017. In the 2017 update, Lawrence Livermore National Laboratory and the Pantex Plant provided new findings. All other sites' issues were the same as in the initial report, but the majority of the previously identified deficiencies corrective action status had changes to "complete." The deficiencies identified in the May 2016 report did not drop off of the updated report.

Each sites sends an annual emergency readiness assurance plan (ERAP) to headquarters. Some sites include a report of deficiencies in the ERAP. Besides the ERAP and deficiency report, the staff is not aware of any other emergency management issue report mechanism to headquarters. The sites each have their own issue tracking system where they track internally and externally identified issues, which the staff recently requested from each site and analyzed.