
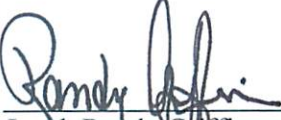
	Number: EA CRAD EA-33-06 Revision: Rev. 0 Effective Date: March 22, 2017
<b>Federal Line Management Oversight of the Field Emergency Management Program Criteria and Review Approach Document</b>		
Authorization and Approval	 Director, Office of Emergency Management Assessments	 Lead, Randy Griffin Emergency Management Specialist  Date: <b>22 MAR 17</b>

## 1.0 PURPOSE

The mission of the U.S. Department of Energy (DOE) Office of Environment, Safety and Health Assessments (EA-30) is to assess the effectiveness of safety and emergency management systems and practices used by line and contractor organizations and to provide clear, concise, rigorous, and independent evaluation reports of performance in protecting workers, the public, and the environment from the hazards associated with DOE activities.

In addition to the general independent oversight requirements and responsibilities specified in DOE Order 227.1A, *Independent Oversight Program*, this criteria and review approach document (CRAD), in part, fulfills the responsibility assigned to EA in DOE Order 151.1C, *Comprehensive Emergency Management System* to provide independent oversight of the department's emergency management program.

The CRADs are available to DOE line and contractor assessment personnel to aid them in developing effective DOE oversight, contractor self-assessment, and corrective action processes. The current revision of EA's CRADs are available at <http://www.energy.gov/ea/criteria-and-review-approach-documents>.

## 2.0 APPLICABILITY

The following CRAD is approved for use by the Office of Emergency Management Assessments, EA-33.

## 3.0 FEEDBACK

Comments and suggestions for improvements on this CRAD can be directed to the Director, Office of Environment, Safety and Health Assessments.

## 4.0 CRITERIA AND REVIEW APPROACH

The objective of this CRAD is evaluating the effectiveness of DOE line management oversight of the emergency management programs at the Program Secretarial Office (PSO) and field element levels. This CRAD encompasses the oversight expectations for line management identified in DOE Order 151.1C, *Comprehensive Emergency Management System*, DOE Order 227.1A, and DOE 226.1B, *Implementation of DOE Oversight Policy*. Further, PSO actions described in DOE's Operating Experience Level 1 (OE-1), *Improving DOE Capabilities for Mitigating Beyond Design Basis Events*, are included. The following functional areas are designed as stand-alone sections to be used in any combination based on the need of the specific appraisal.

### OBJECTIVES

**PO.1: PSOs must periodically review and evaluate the ability of DOE/National Nuclear Security Administration (NNSA) facilities and/or DOE/NNSA contractor-operated facilities to meet requirements of the DOE emergency management system. (DOE Order 151.1C)**

#### Criteria:

1. PSOs must schedule and perform periodic evaluations of emergency management programs every three years. (DOE Order 151.1C)
  - When is the next evaluation scheduled?
  - When was the last evaluation performed?
2. Oversight processes implemented by DOE Headquarters line organizations must include oversight of their DOE field elements, including reviewing contractor activities to the extent necessary to evaluate the implementation and effectiveness of the field element's oversight of its contractors. (DOE Order 226.1B)
  - Are criteria established to determine the effectiveness of the field element oversight?
  - Does the criteria provide meaningful insight into the effectiveness of the field element oversight?
3. Program and exercise evaluations (including appraisals and assessments) must be based on specific standards and criteria, issued by the Director, Office of Emergency Operations. (DOE Order 151.1C)
  - Were specific standards and criteria issued by the Director, Office of Emergency Operations used for program and exercise evaluations?
4. PSOs must participate in the DOE/NNSA Corporate Lessons-Learned Program. (DOE Order 151.1C)
5. PSOs must take timely and appropriate action to address findings and other deficiencies identified in Independent Oversight appraisal reports. (DOE Order 227.1)
6. All program offices, in coordination with responsible contractors, shall evaluate their site emergency management programs' response to severe accidents/events (including beyond design basis events) that could have a site-wide impact, using the guidance in Attachment 1 of OE-1, and make appropriate

enhancements. This review and appropriate enhancements, if not already accomplished, shall be completed by the end of calendar year 2014. (OE-1)

- As the site emergency management programs' response to severe accidents/events been evaluated?
- Were appropriate enhancements completed by December 31, 2014?

## ***REVIEW APPROACH***

### Record Review:

- PSO emergency management lessons learned entered/reviewed during the past three calendar years
- PSO emergency management lessons learned procedure
- PSO emergency management program assessment plans and CRADs for the past three calendar years
- PSO emergency management program assessment procedures
- PSO emergency management program assessment reports for the past three calendar years
- PSO emergency management program assessment schedules for the past three calendar years
- PSO issues management procedures
- PSO OE-1 reviews of site emergency management programs

### Interviews:

- PSO emergency management program lead
- PSO issues management lead
- PSO lessons learned lead

**FE.2: The Field Element, in coordination with the Director, Office of Emergency Operations and Program Offices, support a readiness assurance program consisting of evaluations, improvements and ERAPs. [DOE O 151.1C, I.9.c]**

### **Criteria:**

1. The Field Element emergency management program plan describes a readiness assurance program consisting of evaluations, improvements and ERAPs. [DOE O 151.1C, X.1]
  - Is a readiness assurance program an effective part of the Field Office emergency management program?
  - Is the readiness assurance program adequately described in a procedure/plan/process?
  - Do evaluations, improvements (lessons learned) and ERAPs contribute to the effectiveness of readiness assurance program?
2. The Field Element notifies the Program Office and NA-40 of the site/facility assessment schedule(s) under its purview. (DOE G 151.1-3, D.3.1, P2.6)
  - Has the Field Element developed an assessment schedule for the site/facility contractor site?
  - Has the Field Element developed a self-assessment schedule for its own program?
  - Where is the assessment schedule found?
  - Is the assessment schedule found in the annual ERAP?
  - Has the Field Element sent the assessment schedule of the site/facility contractor site and the Field Element self-assessment schedule to the Program Office and NA-40?
3. The Field Element has participated in a No-Notice exercise in the past three years. DOE O 151.1C, X.2.d] (DOE G 151.1-3, D.3.4.,P5.8)
  - Has the Field Element participated in a No-Notice exercise?
    - Dates:
    - Scope:
    - Participants:

- Who planned/conducted/evaluated the No-Notice exercise?
  - Did DOE-Headquarters also participate in the No-Notice? Do what extent?
  - If a No-Notice exercise has not been conducted, why not?
  - Has the Field Element been specifically requested to participate?
  - Has the Field Element management supported a No-Notice exercise?
  - Was an after action report generated?
4. The Field Element has established and effectively tracks performance measures (indicators) for site/facility contractor sites/facilities.
- Are there established and effective emergency management performance measures (indicators) for the site/facility contractor?
  - Do contractual arrangements with the site/facility contractors provide for measuring the effectiveness of the emergency management programs? [DOE 151.1C, X.2.c]
  - Are there site/facility contractor performance objectives and criteria and appropriate incentives identified and specified in contract documents?
  - Are these performance expectations established on an annual basis? If not, is there a system for establishing them? [DOE O 226.1B, 4.c.]
  - Are the performance indicators:
    - Specific?
    - Measurable?
    - Achievable?
    - Relevant?
    - Time-bound?
  - Do the performance indicators effectively track key functional areas?
  - How is the performance measures (indicators/expectations) communicated to the site/facility contractor? [DOE O 226.1B,5.e.(5)]
  - Are these indicators effective in determining performance?
  - What are the repercussions if the performance is poor?
  - Are the performance measures tracked?
  - Are performance measures analyzed and trends developed?
5. The Field Element has requested emergency management assistance from a Program Office and/or the Director, Office of Emergency Operations. [DOE O 151.1C, X.3.a]
- Has the Field Element requested assistance from a Program Element or NA-40? (i.e., document review, evaluators or assessors for exercises and assessments, answers for technical questions, no-notice exercise)
    - How was the assistance requested?
    - What assistance was requested?
    - Has the Field Element received requested assistance from a Program Element and/or NA-40?
    - Describe the assistance received.
    - Has assistance has been requested and none obtained?
    - Has there been a concern or issue with seeking assistance?
    - Did the assistance result in improved Field Element/Contractor performance or effectiveness in the area(s) requested?

## ***REVIEW APPROACH***

### Document/Record Review

- Field Element/site/facility emergency plan(s) and procedures related to readiness assurance.
- Documentation and records related to emergency management evaluation program.
- Schedule for readiness assurance activities.

- Contracts with performance indicator/expectation clauses related to emergency management.
- ERAPs for the past three years.
- Procedures related to lessons learned.
- Documentation for the incorporation of lessons learned.

#### Interview

- Individual with responsibility for the readiness assurance program.
- Individual with responsibility for the lessons learned program as it applies to the emergency management program.
- Individual with responsibility for the Field Element lessons learned program.

#### Observation

- Not applicable

### **FE.3: Assess the Field Element emergency management program annually and record the results of the self-assessment in the Field Element portion of the ERAP. [DOE O 151.1C, I. 9.c.(3)]**

#### **Criteria:**

1. Field Office has completed a self-assessment of the Field Office emergency management program. [DOE O 151.1C, X.2.a.(2)(b)]
  - Has a thorough and complete self-assessment of the Field Element emergency management program been conducted this fiscal year (or within the last calendar year)? (DOE G 151.1-3, D.3.4, P5.4)
    - A thorough annual self-assessment of the Field Element emergency management program has been conducted in the past three years?
    - Is there a documented process/procedure used to conduct the self-assessment?
    - Were the criteria/LOIs used in conducting this self-assessment appropriate?
    - Who conducted the self-assessment?
    - What organizations were the assessors from?
    - What are the qualifications of the assessors?
    - Does this self- assessment include observations of emergency response?
    - Did the self-assessment address the goals established for the program in the past year?
    - Were the strengths and weaknesses of each program element adequately addressed in the assessment?
2. The results of the Field Office self-assessment are documented and the results recorded in the Field Office portion of the ERAP. [DOE O 151.1C, X.2.a.(2)(b)], (DOE G 151.1-3, D.3.4, P5.6 and P5.22)
  - Has a written report been completed on the self-assessment?
  - Are findings and/or deficiencies adequately identified in the written report?
  - Who reviewed/signed off on the report?
  - Was the result of the self-assessment included in the Field Element portion of the annual ERAP?
  - Did the PSO or NA-40 provide feedback to the ERAP/self-assessment?
    - If so, in what form (formal, informal, email, telephone, etc.?)
3. There is a process in place to correct any deficiencies, weaknesses, improvement items found in the Field Element emergency management program self-assessment. (DOE G 151.1-3, D.3.4, P5.10)
  - Is the process to correct deficiencies, weaknesses, improvement items documented during the self-assessment effective?
  - Did the report correctly identify deficiencies, weaknesses and/or improvement items?
  - Has a corrective action plan been formulated that adequately addresses the deficiencies and weaknesses?

- Is there a process/procedure utilized to address corrective actions? Describe.
  - Are corrective actions placed into a tracking system to ensure closure?
  - Have corrective actions been verified and validated?
  - Was the corrective action effective in preventing reoccurrence?
4. The Field Element has participated in the DOE/NNSA Corporate Lessons Learned program by submitting entries. [DOE O151.1C, X.3.c.]
- Does the Field Element and/or site/facility contractor actively participate in the DOE/NNSA Corporate Lessons Learned Program?
  - Has participation in the program resulted in positive improvements in the emergency management program?
  - Is there a system/process for submitting lessons learned from site/facility contractor/ Field Element to the DOE/NNSA Corporate Lessons Learned Program? Describe.
  - Does the Field Element review the submitting entries from the site/facility contractor?
  - Have “good practices” been considered for lessons-learned?
  - How many entries have been submitted in the past 5 years?
  - How many entries, once submitted, have been accepted in the past 5 years?
  - Are the numbers of submissions/entries indicated in the annual ERAP?
  - Is there a site/facility contractor/Field Element lessons learned data base?
  - If so, is it utilized by the site/facility contractor and/or the Field Element?

## ***REVIEW APPROACH***

### Document/Record Review

- Field Element/Site/facility emergency plan(s) and procedures related to performing assessments.
- Schedule for readiness assurance activities.
- CRADs used to perform Field Element self-assessment.
- Field Element self-assessment reports (including exercises)
- Field Element corrective action process if it not the same system as the contractor.
- Field Element corrective action plan.
- ERAPs submitted and Headquarters’ feedback for the past three years.
- Procedures related to lessons learned.
- Documentation for the incorporation of lessons learned.

### Interview

- Documentation for the incorporation of lessons learned.
- Individual with responsibility for the lessons learned program as it applies to the emergency management program
- Individual with responsibility for the site-wide lessons learned program

### Observation

- Not applicable

**FE.4: Conduct assessments of facility emergency management programs at least once every three years and review contractor self-assessment programs annually to ensure compliance with DOE directives and policy; provide the results/conclusions to the Program Office and the Director, Office of Emergency Operations. [DOE O 151.1C, I.9.m.]**

## Criteria:

1. Site/facility emergency management program elements under the Field Element purview have been assessed during the fiscal/calendar year (The Field Element conducts assessments of the contractor program). [DOE O 151.1C, X.2.a.(2)]
  - Does the Field Element have an effective assessment program?
  - How often is the site/facility emergency management program elements assessed?
  - Is the assessment program part of ISM reviews?
  - Is the assessment done in one assessment or are separate elements done each year?
  - Have response elements been evaluated as part of the assessment?
  - Is there a procedure for how assessments are to be conducted?
  - Does Quality Assurance have any input for assessments?
  - Are objectives/criteria/LOIs used in conducting assessments appropriate?
  - Do the assessments include good practices and/or recommendations?
  - How are the assessments documented? (DOE G 151.1-3, D.3.4, P5.4)
2. Written reports have been completed for assessments conducted. (DOE G 151.1-3, D.3.4., P5.6)
  - Has the Field Element issued a report on the observations of the Field Element assessment of the site/facility contractor?
  - Who in the Field Element reviewed the report prior to issuance?
  - Did the site/facility contractor have the opportunity to comment on the assessment? How?
  - Is there documentation of how site/facility contractor comments were resolved?
  - Who in the Field Element signed the report?
  - Were findings in the report included in the annual ERAP?
3. Site/facility, under the Field Element purview, conducts an annual self-assessment of their emergency management programs. [DOE O 151.1C, X.2.a.(1)], (DOE G 151.1-3, D.3.4., P5.4)
  - Does the site/facility contractor use an effective process/procedure for conducting the annual self-assessment of the site/facility emergency management program?
  - Are all elements of the emergency management program assessed every year?
  - What is the schedule for conducting assessments?
  - Are the objectives/criteria/LOIs used in conducting the self-assessment appropriate?
  - What site/facility contractor personnel conduct the assessment (i.e., emergency management, fire, rad, safety)?
  - Do the annual self-assessments include a response activity (tabletop, drill, exercise) which is evaluated for performance?
  - Were findings of the report included in the annual ERAP?
4. The Field Element has reviewed contractor self-assessment programs to ensure compliance with DOE directives and policy. [DOE O 151.1C, X.2.a], (DOE G 151.1-3, D.3.4., P5.4)
  - Does the Field Element receive a copy of the self-assessments?
  - Does the Field Element review the self-assessments?
  - Is there a set of criteria or a procedure used to review the self-assessments?
  - Who at the Field Element conducts the review?
  - What does the Field Element do with the information gleaned from these self-assessments?
  - Has the Field Element effectively utilized these self-assessments to provide oversight of the site?
  - Is there any documentation of the review of these self-assessments?

## **REVIEW APPROACH**

### Document/Record Review

- Field Element/site/facility emergency plan(s) and procedures related to performing assessments and process for reviewing contractor self- assessments.
- Assessor training and qualifications.
- Schedule for readiness assurance activities including contractor schedule.
- Field Element CRADs used for the contractor assessment.
- Field Element reports on the contractor's emergency management program.
- Exercise planning documents and records, including exercise findings.
- Program reviews, corrective actions, documents/Field Element reports/notes/correspondence on the contractor's self-assessment reports.

### Interview

- Individual with responsibility for the readiness assurance program.
- Individual with responsibility for performing emergency management assessments of the contractor.

### Observation

- Not applicable.

**FE.5: Review and approve Emergency Readiness Assurance Plans (ERAPs) that cover facilities under their supervision; prepare the Field Element ERAP; submit it to the Program Office and the Director, Office of Emergency Operations (NA-40), for inclusion in the annual report on the status of the Emergency Management System. [DOE O 151.1C, I.9.h.]**

### **Criteria:**

1. Site/facility contractors submit ERAP(s) to the Field Element on time (September 30th). [DOE O 151.1C, X.4.a.]
  - Is there a process/procedure exists for writing the ERAP? (DOE G 151.1-3, D.3.1, P2.23)
  - Did the site/facility contractors submit an ERAP to the Field Element utilizing the NA-40/program office template?
  - Was the site/facility contractor ERAP submitted to the Field Element on a timely basis (by September 30)?
  - In keeping with 31 U.S.C. 1115 and 1116, does this report identify what the goals were for the fiscal year that ended coincident with the due date for the report (September 30) [DOE O 151.1C, X.4.a.] (DOE G 151.1-3, DO.3.1, P5.21)
  - Does the report identify the goals for next fiscal year (which starts on October 1)? [DOE O 151.1C, X.4.a.] (DOE G 151.1-3, DO.3.1, P5.21)
  - Does the report highlight program status, including significant changes in emergency management programs (i.e., planning basis, organization, facility mission, exemptions)? (DOE G 151.1-3, DO.3.1, P5.20)
  - Does the ERAP document evaluation of results and the status of associated corrective actions, including site/facility self-assessments and performance measures? (DOE G 151.1-3, DO.3.1, P5.22)
  - Does the ERAP contain a sufficient level of accurate information and analysis to provide management at all levels with adequate tools for gauging emergency management program readiness? (DOE G 151.1-3, DO.3.1, P5.23)
  - Was feedback on actions needed to address needed emergency program improvement provided by the Field Element?



2. The Field Element reviews the ERAP(s) covering facilities under its supervision. [DOE O 151.1C, X.4.c] (DOE G 151.1-3, D.3.1, P2.5)
  - Has the Field Element reviewed the site/facility contractor ERAP?
  - Did the Field Element have any comments/revisions to the site/facility contractor ERAP?
  - Are the comments documented?
  - Is a procedure/checklist used to review the ERAP?
  - Has the site/facility (contractor) ERAP been reviewed in a timely manner?
  - Did the site/facility contractor address the Field Element comments?
  - Did the Field Element approve the site/facility contractor ERAP?
  - Who from the site/facility contractor signed the ERAP?
  - Did the Field Element Manager sign the ERAP or transmitting memo?
3. The Field Element must submit an ERAP summarizing its programs and its facility and activity submissions, to the Program Secretarial Officer and the Director, Office of Emergency Operations, by November 30 of each year. [DOE O 151.1C, X.4.b.]
  - Does the ERAP provide an accurate depiction of the status of the emergency management program?
  - Has the Field Element Emergency Management Program Manager prepared an ERAP for Field Office?
  - Does the report identify what the goals were for the fiscal year that just ended (on September 30)? [DOE O 151.1C, X.4.b.]
  - Does the report indicate to what degree these goals were accomplished? [DOE O 151.1C, X.4.b.]
  - Does the Field Element have a process in place to track and collect the Field Element emergency management activities (throughout the year) to be included in the annual consolidated ERAP? (DOE G 151.1-3, D3.4, P5.20)
4. The Field Element submits the consolidated ERAP to the Director, Office of Emergency Operations and the Program Office by November 30th. [DOE O 151.1C, X.4.b.]
  - Does the ERAP consolidate both site/facility contractor and the Field Element?
  - Does the Field Element Manager sign the consolidated ERAP?
  - Is there a formal process for submitting the Field Element/site/facility (contractor) ERAP to the Program Office and the Director, Office of Emergency Operations?
  - Has the consolidated ERAP been submitted to Director, Office of Emergency Operations and the Program Office by November 30? If not, what is the reason?
  - Was feedback related to emergency management program effectiveness provided to the Field Element or the Program Office to the Filed Element or contractor? Was action taken in response to this feedback?
  - Does the Field Element management consider the ERAP an effective process for monitoring and improving emergency management program effectiveness?

## ***REVIEW APPROACH***

### Document/Record Review

- Field Element/Site/facility emergency plan(s) and procedures related to developing and approving ERAPs.
- ERAPs for the past 3 years.
- Schedule for readiness assurance activities.
- Contracts with performance indicator/expectation clauses related to emergency management.

#### Interview

- Individual with responsibility for the readiness assurance program.
- Individual with responsibility for developing/reviewing ERAPs.

#### Observation

- Not applicable.

### **FE.6: Implement corrective actions lessons learned from actual emergency responses and based on findings from evaluations, assessments, and appraisals. [DOE O 151.1C, I.9.o.]**

#### **Criteria:**

1. Identify the causes of problems, and include prevention of recurrence as a part of corrective action planning. [DOE O 414.D, Att.2,3.b.]
  - Has a causal analysis been completed of the findings for actual emergency responses, exercise evaluations, and assessments (appraisals)?
  - Have corrective actions for findings from actual emergency responses, exercise evaluations and assessments (appraisals) based on the causal analysis been formulated?
  - Have evaluated findings from program and exercise evaluations by organizations external to site/facility/the Field Element been acknowledged and include a corresponding corrective action plan?
  - Do corrective actions include:
    - Measures to correct deficiency?
    - Identification of root cause? (see above)
    - Determination of the existence of similar deficiencies or underlying causes?
    - Actions to preclude recurrence of like or similar deficiencies?
    - Assignment of corrective action responsibility?
    - Completion dates for each corrective action? (DOE G 414.1-1C, 4.7.8)
  - Do corrective actions use the results of DOE line and independent oversight and contractor assurance systems to make informed decisions about corrective actions? [DOE O 226.1B, 5.e.(6)]
2. Corrective actions/lessons learned from actual emergency responses, exercise evaluations, and/or assessments have been implemented. (DOE G 151.1-3, D.3.4, P5.10)
  - Have corrective action plans been developed within 30 working days of receipt of final evaluation report? (DOE 151.1-3 D.3.4, P5-12)
  - Have corrective actions been planned/scheduled?
  - Have corrective actions been effectively implemented?
  - Have corrective actions been completed as soon as possible? (DOE G 151.1-3, D.3.4, P5.13)
  - Have corrective actions been completed before the next annual self-assessment? (DOE G 151.1-3, D.3.4, P5.13)
3. Completion of corrective actions for facility and site exercise includes a verification and validation process, which verifies that the corrective action has been put in place and validates that the corrective action has been effective in resolving the original finding. [DOE O 151.1C, X.3.b.(3)], (DOE G 151.1-3, D.3.4, P5.14)
  - Do the corrective action plans indicate the verification and validation process for each corrective action?
  - Has the site/facility site verified that the corrective action indicated in the corrective action plan been completed for actual events, exercise evaluations and program assessments?
  - Has the Field Element verified that site/facility has completed the corrective action? (pick several findings and track corrective action for verification)

- Is there documentation that site/facility/the Field Element has verified that corrective actions have been completed?
  - Is there a validation process at site/facility/the Field Element?
  - Have corrective actions that are verified, been also validated for their effectiveness in resolving the original finding?
  - What processes have been utilized for validation (training exams, drills, tabletops, exercises)?
  - Are verification and validation actions in the tracking system?
4. The verification and validation process is independent of those who performed the corrective action. (DOE G 151.1-3, D.3.4, P5.15, P5.16)
- Who has performed verification of corrective actions?
  - Who has performed validation of corrective actions?
  - Are the individuals who have verified the corrective actions, independent of the individuals who have performed these actions?
  - Are the individuals who have validated the corrective actions, independent of the individuals who have performed these actions and verified the actions?
  - Have findings from program and exercise evaluations by external organizations been validated by the evaluating organizations?
  - What are the qualifications of the individuals who verified/validated?
  - Is the Quality Assurance Department of site/facility/the Field Element used to either verify or validate?
  - In looking at the recent events and the corrective actions developed by site/facility/the Field Element.
    - Have the corrective actions been completed on schedule?
    - Have the corrective action been verified?
    - Have the corrective actions been validated?
    - How have the corrective actions been validated?
    - Who verified and who validated the corrective actions?
5. Corrective actions involving revision of procedures or training of personnel are completed before the next exercise. (DOE G 151.1-3, D.3.4, P5.14)
- Have corrective actions involving revision of procedures been completed before the next exercise (so they can be validated)?
  - Has corrective actions involving training of personnel been completed before the next exercise (so the actions can be validated)?
  - Did any of the corrective actions associated with the site/facility/the Field Element events (fire and release) entail the revision of procedures and/or training of personnel?
  - Were these actions (revision of procedures/training of personnel) completed before the next exercise?
6. Lessons learned from actual emergency responses, exercise evaluations, and/or assessments have been implemented. (DOE G 151.1-3, D.3.4, P5.10)
- Is there a separate lessons-learned program at the Field Element/site/facility apart from the DOE Corporate System?
  - Is emergency management part of the lessons-learned program?
  - How are lessons-learned entered into the system?
  - Describe the system of submitting lessons learned?
  - Does a specific person at the Field Element approve/submit lessons learned?
  - Does the Field Element use the DOE Corporate Lessons Learned System?
7. The Field Element submits lessons learned to the DOE/NNSA Corporate Lessons Learned Program. [DOE O 151.1C, X.3.c]
- Is the DOE/NNSA Corporate Lessons Learned Program used at the Field Element / site/facility?

- Does the Field Element submit lessons learned into the system?
  - Is there a procedure for submitting lessons learned?
  - Has the site/facility contractor submitted lessons learned to the Field Element for inclusion into the system?
8. Lessons Learned from training, drills, actual responses and site-wide lessons learned program are incorporated and tracked in the readiness assurance program. [DOE O 226.1A, Att.2, 2.c.(2)], (DOE G 151.1-3, D.3.4, P5.8)
- Have lessons learned from training, drills, assessments and actual responses been effectively incorporated into the Field Element /site/facility contractor emergency management program? How?
  - Do these lessons learned come from the Field Element / site/facility contractor lessons learned program, the DOE Corporate Lessons Learned Program and/or both?
  - Is there a process/procedure for reviewing/incorporating lessons learned?
  - Does the Field Element/site/facility contractor review the DOE Corporate Lessons Learned Program for applicable emergency management lessons learned?
  - How many lessons learned have been incorporated?

## ***REVIEW APPROACH***

### Document/Record Review

- Field Element/Site/facility emergency plan(s) and procedures related developing, implementing, tracking and closing corrective actions.
- Field Element corrective action process if it not the same system as the contractor.
- ERAP and documentation of program reviews, corrective actions, and documents that track findings and corrective actions, including a process to verify and validate results.
- Procedures related to lessons learned.
- Documentation for the incorporation of lessons learned.
- Review several assessments and exercise evaluations reports to determine findings and compare to corrective action plans to determine if a causal analysis has been done and if the corrective actions address the finding.
- Field Element staff training and qualifications for evaluating emergency management program effectiveness.

### Interview

- Individual with responsibility for the readiness assurance program.
- Individual with responsibility for the lessons learned program as it applies to the emergency management program.
- Individual with responsibility for the site-wide lessons learned program.

### Observation

- Pick several corrective actions that have been closed. Verify through observation or document check that the issue identified has been resolved.