

# **Independent Assessment of the Idaho National Laboratory Emergency Management 2025 Annual Exercise**

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## Acronyms

|         |   |
|---------|---|
| BEA     | Battelle Energy Alliance, LLC                   |
| BLM     | Bureau of Land Management                       |
| CFA     | Central Facilities Area                         |
| CRAD    | Criteria and Review Approach Document           |
| DOE     | U.S. Department of Energy                       |
| DOE-ID  | DOE Idaho Operations Office                     |
| EA      | Office of Enterprise Assessments                |
| EAL     | Emergency Action Level                          |
| EAM     | Emergency Action Manager                        |
| ECC     | Emergency Control Center                        |
| ED      | Emergency Director                              |
| EOC     | Emergency Operations Center                     |
| EOS     | Emergency Operations System                     |
| EPIP    | Emergency Plan Implementing Procedure           |
| ERO     | Emergency Response Organization                 |
| HFEF    | Hot Fuel Examination Facility                   |
| IC      | Incident Commander                              |
| ICP     | Incident Command Post                           |
| IEC     | Idaho Environmental Coalition, LLC              |
| INL     | Idaho National Laboratory                       |
| INTEC   | Idaho Nuclear Technology and Engineering Center |
| JIC     | Joint Information Center                        |
| MFC     | Materials and Fuels Complex                     |
| NIMS    | National Incident Management System             |
| OE      | Operational Emergency                           |
| OFI     | Opportunity for Improvement                     |
| PA      | Protective Action                               |
| RWMC    | Radioactive Waste Management Complex            |
| SIP     | Shelter(ed) In Place                            |
| UC      | Unified Command                                 |
| WCC     | Warning Communications Center                   |
| WebEOC® | Web-based Emergency Operations Center Software  |

# **INDEPENDENT ASSESSMENT OF THE IDAHO NATIONAL LABORATORY EMERGENCY MANAGEMENT 2025 ANNUAL EXERCISE**

## **Executive Summary**

The U.S. Department of Energy (DOE) Office of Enterprise Assessments (EA) conducted an independent assessment of emergency management during the 2025 annual exercise at the Idaho National Laboratory from May to July 2025. The assessment evaluated the effectiveness of the management and operating contractor, Battelle Energy Alliance, LLC (BEA), and the DOE Office of Nuclear Energy's Idaho Operations Office (DOE-ID) program in managing and maintaining emergency response organization performance. Although not specifically evaluated, Idaho Environmental Coalition, LLC (IEC), the DOE Office of Environmental Management's management and operating contractor for the Idaho Operations Office Idaho Cleanup Project, participated in the exercise.

EA identified the following strengths:

- BEA staffed an emergency response organization consisting of personnel with the skills and disciplines necessary for mitigating emergency incidents.
- BEA maintained several interoperable systems to facilitate communication among response components.
- BEA effectively interfaced with several local, state, tribal, and Federal organizations throughout the simulated emergency response.

EA also identified several areas of concern, including four findings, as summarized below:

- BEA did not demonstrate an effective emergency operations system that validates and coordinates incident information to establish and maintain situational awareness and a common operating picture among response components. (Finding)
- BEA did not categorize the emergency incident in a timely manner. (Finding)
- BEA did not provide complete and accurate initial and follow-up notifications to all appropriate stakeholders; BEA's notification process does not include all required information and does not include a phone call to the DOE Headquarters Watch Office reporting emergency details. (Finding)
- DOE-ID has not established an individual emergency response organization position with the authority to implement the site emergency management plan to include management and control of all aspects of the site response and has not ensured an integrated and comprehensive emergency management system between BEA and IEC that can respond effectively and efficiently to all Operational Emergencies so that appropriate response measures are taken to protect workers, the public, the environment, and national security. (Finding)

In summary, the BEA and DOE-ID emergency management program can respond to hazards at the Idaho National Laboratory, and several strengths were identified during the exercise. However, performance weaknesses in the response to the postulated multiple-facility incident hindered some aspects of the emergency response. Identified weaknesses relate to the concept of operation among multiple site contractors, the categorization of emergency conditions such as Operational Emergencies, and the completeness and accuracy of initial and follow-up notifications. Until the concerns identified in this report are addressed or effective mitigations are put in place, responses to real-world emergencies could be impaired.

# **INDEPENDENT ASSESSMENT OF THE IDAHO NATIONAL LABORATORY EMERGENCY MANAGEMENT 2025 ANNUAL EXERCISE**

## **1.0 INTRODUCTION**

The U.S. Department of Energy (DOE) Office of Emergency Management Assessments, within the independent Office of Enterprise Assessments (EA), assessed the Idaho National Laboratory (INL) emergency management 2025 annual exercise. This assessment was conducted as part of an ongoing series of assessments of emergency management exercises and programs at DOE sites. Assessment activities were conducted from May to July 2025.

This assessment evaluated the effectiveness of the management and operating contractor, Battelle Energy Alliance, LLC (BEA), and the Office of Nuclear Energy's DOE Idaho Operations Office (DOE-ID) program in managing and maintaining emergency response organization (ERO) performance during the June 10-11, 2025, annual emergency management exercise. Although not specifically evaluated, Idaho Environmental Coalition, LLC (IEC), the managing contractor for cleanup operations at INL, was a significant participant in the exercise. This assessment evaluated the performance of the ERO at key venues, including the emergency control centers (ECCs), the emergency operations center (EOC), and the incident command post (ICP), with a focus on decision-making ERO positions, such as the emergency director (ED) and incident commander (IC). Issues identified during the exercise evaluation were further examined to determine possible causes, such as a lack of training or insufficient procedural guidance. This assessment was conducted in accordance with the *Plan for the Independent Assessment of the 2025 Idaho National Laboratory Emergency Management Annual Exercise, April 2025*.

## **2.0 METHODOLOGY**

The DOE independent oversight program is described in and governed by DOE Order 227.1A, *Independent Oversight Program*, which EA implements through a comprehensive set of internal protocols, operating practices, assessment guides, and process guides. This report uses the terms “best practices, deficiencies, findings, and opportunities for improvement (OFIs)” as defined in the order.

As identified in the assessment plan, this assessment considered requirements documented in DOE Order 151.1D, *Comprehensive Emergency Management System*. EA used the following sections of EA CRAD 33-09, Revision 0, *DOE O 151.1D Emergency Management Program*: section 4.3, *Emergency Response Organization*; section 4.4, *Emergency Operations System*; section 4.6, *Offsite Response Interface*; section 4.7, *Emergency Classification*; section 4.8, *Protective Actions*; section 4.9, *Consequence Assessment*; section 4.11, *Notifications and Communications*; section 4.12, *Emergency Public Information*; and section 4.15, *Exercises*.

EA examined key documents, such as the exercise package, exercise evaluation guides, emergency plans, checklists, procedures, manuals, analyses, policies, and training and qualification records. EA also interviewed key personnel responsible for developing and executing the emergency management program; observed exercise planning activities; and walked down significant portions of selected INL facilities, focusing on emergency response. The members of the assessment team, the Quality Review Board, and the management responsible for this assessment are listed in appendix A.

EA conducted a previous assessment of emergency management at INL in 2021, as documented in the EA report *Independent Assessment of Emergency Management at the Idaho National Laboratory, April 2022*. This current assessment examined the completion and effectiveness of corrective actions for the EA findings identified in the previous assessment. Results of the corrective action review are included in section 3.9 of this report.

### **3.0 RESULTS**

BEA designed and conducted a two-day, annual exercise to evaluate emergency response capabilities and multiple processes of key onsite ERO teams. The exercise focused on the use of appropriate plans, policies, and procedures, as well as the actions of ERO members involved in management, direction, and command and control functions. BEA conducted the exercise in a realistic, real-time environment in response facilities that necessitated actions by facility workers, the site-level ERO, and significant offsite participation. The postulated incident involved a wildland fire on INL property, resulting in an Operational Emergency (OE) not requiring classification. The INL fire department responded to the incident and assumed IC duties. The EOC, joint information center (JIC), staff duty officer (SDO) group, and the Central Facilities Area (CFA) ECC were activated in support of the wildland fire response. The exercise involved a turnover to a second team in the EOC, JIC, SDO, and CFA groups. The exercise also involved a loss of offsite power at the Materials and Fuels Complex (MFC) and the subsequent loss of standby diesel generator power at the Hot Fuel Examination Facility (HFEF), resulting in an OE not requiring classification. In addition, an exercise-simulated vehicle accident occurred involving an INL fire engine and a personally owned vehicle, resulting in three personnel injured and two fatalities. A local air ambulance was called and provided transport of one role-player patient to a local hospital, and the Butte County coroner was called due to the two exercise-simulated fatalities.

#### **3.1 Emergency Operations System**

This portion of the assessment determined whether the BEA emergency operations system (EOS) provides centralized collection, validation, analysis, and coordination of information related to an INL incident response, and whether that information is used to obtain and maintain situational awareness and disseminate a common operating picture among response components to achieve a well-coordinated, well-understood, and effective response.

BEA had adequate EOS capabilities to collect incident information, to provide needed expertise for incident analysis from a centralized EOC, and to ensure that the EOS was consistent with the operational concepts of the National Incident Management System (NIMS). In addition, the INL emergency plan and implementing documents adequately establish the EOS to support an ERO structure that consists of a tiered approach for responding to OEs. For example,

- Clear authority was given to the BEA IC to manage the incident scene.
- BEA emergency action managers (EAMs) appropriately managed CFA and MFC facility responses including categorization, notification, and protective action (PA) decision-making before the EOC was operational. IEC EAMs managed Radioactive Waste Management Complex (RWMC) and Idaho Nuclear Technology and Engineering Center (INTEC) facility responses after the EOC was operational.
- BEA provided adequate management of site-level facilities, organizations, and capabilities, including the Warning Communications Center (WCC), EOC, and JIC.
- BEA appropriately used the web-based emergency operations center software (WebEOC®), a commercially available information management software, to enable centralized collection,

validation, analysis, and coordination of information that supports on-scene response during an escalating incident by relieving the burden of site-level and external communication and documenting requests for additional resources needed for the response.

The INL fire department IC and the Bureau of Land Management (BLM) IC demonstrated an effective unified command (UC) during the incident by geographically dividing the emergency into firefighting sectors and the vehicle accident sector. In addition, the UC maintained appropriate situational awareness and a common operating picture with a delegation from the Shoshone-Bannock Tribes at the ICP, where tribal firefighting resources and tactics were discussed. The UC staff acquired information on the evolution of the wildland fire and the unified field response from 120 wildland firefighters, representing 10 different departments and agencies. Furthermore, the UC effectively coordinated with air ambulance support to provide a medical emergency evacuation while simultaneously coordinating air tanker drops to suppress the simulated wildland fire nearby. Incident scene information was relayed via radio to the CFA ECC and WebEOC was the primary tool used to disseminate information among the EOC and ECCs.

While the UC demonstrated effective command and control of the on-scene incident response, information from the UC was not adequately captured and disseminated by the CFA ECC in WebEOC, as required by BEA procedures. Similarly, other ECCs did not capture facility-specific response information in WebEOC to enable a common operating picture among the EOC and the ECCs at CFA, MFC, INTEC, and RWMC. Contrary to DOE Order 151.1D, attachment 3, paragraphs 4 and 11.b.(6), BEA did not adequately maintain situational awareness or disseminate a common operating picture among response components during the exercise. (See **Finding F-BEA-1**.) Consequently, the emergency notifications submitted to offsite agencies contained conflicting and incomplete information. For example, the following weaknesses were identified:

- Emergency notifications submitted eight minutes apart by the CFA ECC and EOC were significantly different regarding the location of the fire and the need for offsite agency support.
- RWMC issued two emergency notifications on June 11, 2025, both indicating that an unclassified OE had been declared at 0903 hours. The emergency action level (EAL) used was CFA-ALL-1.OE2, the same EAL used by the EOC on the previous day to declare an unclassified OE at 1456 hours. The EOC was not aware that RWMC had issued a notification for incident termination on June 11, 2025, at 0848 hours.
- At 0934 hours on June 11, 2025, RWMC issued PA information in its notification that RWMC was evacuating all personnel and the ECC was relocating to the REC facility, which contradicted the EOC's June 11, 2025, 0938 hours emergency notification that RWMC was sheltered in place (SIP).
- The EOC issued an emergency notification on June 11, 2025, at 1020 hours with an incident description of "MFC total area evacuation of non-essential personnel. Power loss at MFC-785 and generator failure. RWMC was sheltered in place." The emergency notification included inaccurate information related to injuries from a vehicle accident that contributed to misinformation in the third press release.

Importantly, identified weaknesses in the command and control of the multiple-facility incident were mostly the result of an ambiguous flowdown of requirements to BEA and IEC regarding ERO decision-making. Contrary to DOE Order 151.1D, attachment 3, paragraph 3.c, DOE-ID has not established an individual ERO position with the authority to implement the site emergency management plan to include management and control of all aspects of the site response. Likewise, DOE-ID has not ensured a fully integrated and comprehensive emergency management system between BEA and IEC that can respond effectively and efficiently to all OEs so that appropriate response measures are taken to protect workers, the public, the environment, and national security, as required by DOE Order 151.1D, paragraph 4.a.(1). (See **Finding F-DOE-ID-1**.) Consequently, the absence of clear responsibilities for

managing an integrated response along with performance errors resulted in weaknesses regarding situational awareness, incident categorization, notifications, and PAs. Although BEA has documented a general concept of operations relative to incident command and control in the INL emergency plan, the plan does not establish an individual ERO position to implement the plan and integrate all response venues, regardless of contractor affiliation. (See **OFI-DOE-ID-1.**)

Although BEA describes ERO activities associated with notifications in PLN-114, *Idaho National Laboratory Emergency Plan/Resource Conservation and Recovery Act Contingency Plan*, and EPI-9, *Emergency Incident Notifications*, the ERO did not perform all notification functions as described in the plan and EPI-9, section 3.1, which states that the ED is responsible for notifications for a multiple-facility incident. In addition, BEA did not adequately implement EPI-9, section 4.1.3 that states that the ED will make consolidated notifications issued by the EOC for multiple-facility incidents or severe incidents. For example, the following weaknesses were identified:

- During the exercise, the ED accepted responsibility for categorization/classification, PAs, and notifications from the CFA EAM. This transfer of responsibility was documented in WebEOC. The concept of operations is not documented for a multiple-facility incident regarding decision-making responsibilities at other ECCs.
- Following the transfer of notification responsibility, seven emergency notifications were issued. These notifications were not consolidated in the EOC; two were transmitted by IEC EAMs at the RWMC, one by the IEC INTEC EAM, and one by the BEA MFC EAM. BEA transmitted three emergency notifications from the EOC.
- Emergency notifications transmitted from all ECCs were not approved by the ED prior to issuance and contained information that conflicted with information transmitted from the EOC. For example, an emergency notification issued by the RWMC EAM at 0934 hours on June 11, 2025, indicated that RWMC was evacuating all personnel, while an emergency notification issued by BEA from the EOC at 0938 hours indicated that IEC personnel were SIP.

As observed during the exercise, IEC EAMs independently exercised responsibility for decision-making relative to incident categorization and classification, notifications, and PAs. IAG-773, *Blanket Master Agreement for Services Battelle Energy Alliance, LLC Provides Idaho Environmental Coalition, LLC at DOE's Idaho National Laboratory*, states that BEA only provides support to IEC during an incident response at an IEC-managed facility. As a result, ERO performance demonstrated the absence of an integrated and coordinated command and control between BEA and IEC. For example, the following weaknesses were identified:

- In accordance with BEA procedures, the ED is responsible for sitewide, multiple-facility, and security incidents, and determining OE categorization/classification, implementing/initiating PAs, and making protective action recommendations to other site contractors and offsite agencies. This implies that other site contractors are treated the same as offsite populations managed by state and local jurisdictions and are not required to implement PAs ordered by the ED. During the exercise, the ED did not perform these actions and relied on IEC to conduct these responsibilities for INTEC and RWMC.
- In accordance with EPI-9, the ED is responsible for offsite notifications as previously mentioned. During the exercise, the ED did not perform these actions and relied on IEC to conduct these responsibilities for INTEC and RWMC.
- The EOC command team and facility ECCs, including the IEC ECCs, did not reflect a common operating picture regarding the reporting of media interest, which was stated as unknown on the emergency notifications for the duration of the incident. This occurred even though an OE had been



declared (resulting in SIP and evacuation PAs) and a news release had been issued providing public information about the significant offsite response to assist injured personnel.

## **Emergency Operations System Conclusions**

Overall, the BEA EOS is structured consistently with the operational concepts of NIMS, and BEA and IEC had adequate capabilities to collect incident information from centralized and well-equipped facilities. However, during the exercise, BEA and IEC did not maintain a common operating picture of the emergency response and did not provide adequate situational awareness among response facilities, field response elements, and offsite command centers, including Headquarters. Also, DOE-ID has not ensured an integrated and comprehensive concept of operations between BEA and IEC for the management of multiple-facility incidents, such as a large wildland fire. Consequently, the INL ERO does not have an individual position with the authority to implement the site/facility/activity emergency management plan to include management and control of all aspects of the site response.

### **3.2 Emergency Categorization**

This portion of the assessment evaluated the effectiveness of BEA in meeting core program requirements to correctly categorize an emergency incident as promptly as possible, but no later than 15 minutes after incident identification by the predetermined decision-maker for categorization, and no more than 30 minutes from initial discovery.

BEA has a defined process for categorization of a specific BEA incident; however, there is no formal documentation/agreement between BEA and IEC that requires the use of this process for incidents affecting both contractors. Section 5 of BEA's PLN-114 contains the necessary definitions, guidelines, and order requirements to appropriately categorize and classify incidents affecting single or multiple BEA facilities and implies that IEC follows this same process at its facilities. It divides EALs into three types: facility-specific, sitewide, and discretionary. It states that for any incident at an INL facility, except a security incident, the originating-facility EAM is responsible for categorizing and classifying the incident. Emergency plan implementing procedures (EPIPs) for each facility contain EALs used by the facility EAM to categorize and classify the incident. The originating-facility EAM can formally transfer responsibility for the categorization and classification function to the ED. Once the INL EOC is operational, this transfer can occur at any time during incident response. However, there is no detailed agreement that IEC must follow the process identified in the emergency plan, and as stated in the previous section, the exercise demonstrated an absence of integrated and coordinated decision-making with respect to categorization. (See **Finding F-DOE-ID-1**, **OFI-BEA-1**, and **OFI-DOE-ID-1**.)

During the exercise, BEA did not appropriately categorize the OE within the required time frame. The scenario planner anticipated two categorizations: the first one to be completed by the CFA EAM on June 10, 2025, due to the wildland fire, and the second one to be completed by the MFC EAM on June 11, 2025, due to a complete loss of electrical power to the HFEF at MFC. On June 10, 2025, following activation of the CFA ECC and receiving initial reports of the fire, the CFA EAM reviewed the appropriate EAL (CFAALL1.OE.2) in the required timeframe. However, contrary to expectations, the CFA EAM stated that the incident did not meet the EAL conditions corresponding to a wildland fire "that damages or poses an imminent threat to substantial structures or facilities (not just fence posts, signs, or outbuildings)." Subsequently, the CFA EAM transferred categorization authority to the EOC ED who categorized the incident within minutes of receiving authority, but one hour and six minutes (adjusted for an exercise pause) after initial incident identification, with no additional information being provided to the ED. Contrary to DOE Order 151.1D, attachment 3, paragraph 8.b., BEA did not categorize the incident as promptly as possible, but no later than 15 minutes after identification by the predetermined decision-maker for the categorization, and no more than 30 minutes from initial discovery. (See **Finding**

**F-BEA-2** and **OFI-BEA-1**.) Consequently, BEA delayed the notification of DOE Headquarters and the public of a significant OE occurring on the site. On June 11, 2025, after the CFA EAM transferred categorization authorization to the EOC ED, the MFC EAM categorized the complete loss of power to the HFEF correctly and promptly.

Furthermore, per EPI-10, *CFA Operational Emergency Categorization/Classification and Protective Actions*, and EPI-25, *Response to Wildland Fires*, the CFA EAM categorizes and classifies wildland fire incidents anywhere on the INL site, contrary to section 5 of PLN-114. Additionally, section 5 of PLN-114 is unclear as to whether each facility EAM maintains categorization authority separately or, once the authority is transferred by one EAM, the transfer of authority applies to all facilities. (See **OFI-BEA-1**.)

### **Emergency Categorization Conclusions**

Overall, BEA has a defined process for incident categorization but does not have documented agreement and coordination with IEC to follow this process. Additionally, BEA did not categorize the fire within the required time specified by the order. Finally, section 5 of PLN-114 is unclear regarding some aspects of categorization and classification authority.

### **3.3 Protective Actions**

This portion of the assessment evaluated whether BEA correctly identified and implemented PAs and protective action recommendations to minimize the consequences of an emergency and to protect the health and safety of workers and the public.

During the exercise, BEA adequately executed the implementation of PAs in accordance with its procedures, with a few exceptions. On June 10, 2025, before categorizing the incident as an OE, the CFA EAM appropriately issued precautionary PAs and verified that no field workers were located at the National Security Test range north of MFC in accordance with EPI-25. On June 11, 2025, with the fire having spread and now threatening MFC, the MFC EAM ordered an evacuation of non-essential personnel from the facility, and the CFA ECC appropriately coordinated the request. Additionally, throughout the morning, the CFA ECC received requests and notifications of SIP PAs and coordinated appropriate facility evacuations. Finally, at 1013 hours on June 11, 2025, the CFA EAM and the CFA Security Lead ordered the closing of four site access points to inbound traffic, essentially closing the INL site.

While most PAs were implemented adequately, BEA did not maintain a clear understanding and common operating picture regarding PAs conducted throughout the site. There was no summary of the various PAs that had been implemented by the different facilities except the logging of the actions in the WebEOC significant events log that serves more as an informational archive function and historical record as new entries are constantly added above each entry. As noted in section 3.1, at one point on June 11, 2025, the ERO issued two emergency notifications within four minutes of each other, indicating that RWMC had SIP and the other stating that RWMC was being evacuated. (See **OFI-DOE-ID-1** and **OFI-BEA-2**.) Additionally, despite the ED having authority for PA decision-making, on June 11, 2025, the CFA ECC closed the entire site to inbound traffic without consulting the ED.

### **Protective Actions Conclusions**

BEA adequately defines the implementation of PAs in its emergency management documents and demonstrated effective implementation of PAs during the incident. However, BEA did not maintain a clear and common understanding of the PAs throughout the site.

### 3.4 Notifications and Communications

This portion of the assessment determined whether BEA provided initial notifications promptly, accurately, and effectively, and whether the ERO maintained effective communications throughout the response.

#### 3.4.1 Notifications

BEA has a defined process for performing offsite notifications as described in EPI-9. During the exercise, BEA provided prompt emergency notifications to emergency response personnel and response organizations. BEA has adequate capabilities to complete the required notifications, with a few significant exceptions. Upon receiving a report of a fire north of MFC, the Fire and Alarm Emergency Dispatch Center within the WCC, promptly dispatched the INL fire department and provided an incident description and meteorological information. The WCC effectively used Everbridge, an automated system delivering voice, text, and email messages, to notify and activate the INL EROs and response facility EROs.

BEA did not provide complete and accurate initial and follow-up notifications to all appropriate offsite stakeholders. BEA used Form 150.6, *Idaho National Laboratory Emergency Notification Form*, to collect information used to notify offsite agencies, including the DOE Headquarters Watch Office. The forms were processed on WebEOC, and the information was automatically copied to an Everbridge email when the form was saved. The BEA Everbridge system automatically transmitted the notification email to offsite agencies. Following the notification email, the WCC called the DOE Headquarters Watch Office to verify receipt but did not include a discussion of incident-specific information with the DOE Headquarters Watch Officer, as required by DOE Order 151.1D, attachment 3, paragraph 11.a.(6). In addition, the initial information provided on the INL notification email did not include the date and time the emergency was discovered or terminated as required by DOE Order 151.1D, attachment 3, paragraph 11.a.(6). As a result, contrary to DOE Order 151.1D, attachment 3, paragraph 11.a.(6), BEA did not provide complete and accurate initial and follow-up notifications to all appropriate stakeholders. (See **Finding F-BEA-3** and **OFI-BEA-3**.) Consequently, BEA did not adequately keep the DOE Headquarters Watch Office up-to-date with complete and current information.

In addition to the items discussed above, several additional notification issues contributed to BEA not providing complete and accurate initial and follow-up notifications. For example:

- EPI-9, section 3.1, states that the ED is responsible for consolidated notifications. However, WebEOC does not allow the sharing of a notification form from one response facility to the EOC so that the ED can compile a consolidated notification. During the exercise, based on the loss of power in HFEF, the MFC EAM attempted to forward a notification form to the ED for approval and issuance, but WebEOC would not allow the action. As a result, the MFC EAM declared the OE and submitted the notification form to offsite stakeholders.
- Following the ED's acceptance of notification responsibility, four offsite notification forms were distributed by EAMs outside the EOC and did not have ED approval – two from RWMC, one from INTEC, and one from MFC. As discussed in section 3.1, these notification forms were inaccurate and did not reflect a common operating picture.
- EPI-9 states that when using WebEOC, the "time of notification" is automatically recorded on the notification form and is defined as the time the notification form is electronically transmitted to offsite agencies and DOE Headquarters. Contrary to this statement, the time of notification that is automatically recorded on the notification form is the time the form is electronically opened, resulting in the time of notification often preceding the time of incident categorization. Additionally, the

notification email that is sent by Everbridge does not have a notification time listed; the email only includes the notification date.

- EPI-9 states that any questions on the notification form will be answered by the DOE-ID management duty officer; however, the notification information transmitted to the DOE Headquarters Watch Office does not contain contact information for the DOE-ID management duty officer. The Everbridge email contains two email addresses for individuals in the WCC that the DOE Headquarters Watch Office is to contact for questions.

### **3.4.2 Communications**

BEA has adequate communications capabilities and maintains plans, procedures, and several interoperable systems to facilitate effective communications among ERO response elements, including radio, cell phone, Everbridge, and WebEOC; however, limited radio and cell phone coverage in some areas contributed to situational awareness issues discussed in section 3.1. Notably, the WCC effectively managed radio communication with multiple incident scenes by assigning specific radio channels to each incident scene. BEA and IEC responders consistently maintained rigorous three-way radio communications (repeat back) and the use of the phrase “This is a drill” throughout the emergency response per EPI-83, *Communications*. However, as discussed in section 3.1, centralized collection, validation, analysis, and coordination of information among response components did not result in adequate situational awareness and an effective common operating picture, including notification forms that contained incomplete and inaccurate information.

### **Notifications and Communications Conclusions**

Overall, BEA has a defined process for performing offsite notifications as described in EPI-9. BEA also has adequate communications capabilities and maintains plans, procedures, and several interoperable systems to facilitate effective communications among ERO response elements. However, BEA did not provide complete and accurate initial and follow-up notifications to all appropriate offsite stakeholders. The call to the DOE Headquarters Watch Office did not provide the required information, and the emergency notification email did not include the date and time that the emergency was discovered or terminated.

### **3.5 Consequence Assessment**

This portion of the assessment determined whether BEA’s consequence assessment activities provided conservative timely initial assessment, accurate projections using incident conditions, and supportive assessments throughout the emergency.

BEA maintains adequate consequence assessment processes and guidelines in EPIPs and checklists as well as PLN-114. During the exercise, BEA had adequate consequence assessment capabilities to identify and correctly assess the estimates of onsite and offsite consequences of actual or potential releases of hazardous materials considering site-specific characteristics (e.g., topography, meteorology). An embedded National Oceanic and Atmospheric Administration employee is also part of the EOC consequence assessment planning team to provide and interpret meteorological information. Although a timely initial assessment was not required for this incident, the planning team adequately examined the fire’s reported location and direction of travel and appropriately evaluated the relevant facilities and areas of fixed contamination and determined that a wildfire-initiated hazardous material release was not a concern.

In addition, the planning team used the National Atmospheric Release Advisory Capability’s Unknown Material – Large Fire module to project smoke spread from the advancing fire and briefed the EOC on the projection. Additionally, the ED tasked the planning team to evaluate the impact of smoke on roads and

evacuation routes. However, BEA did not appropriately integrate this information into its iMap geographic information system with other response information (e.g., roadblocks) to enable a shared common operating picture among the ERO. This iMap sharing limitation adversely affected situational awareness as to the impact of smoke and fire spread on roads and evacuation routes. (See **OFI-BEA-4.**)

The assessment specialist supported the Site Monitoring Team Coordinator, environmental specialists, Idaho Department of Environmental Quality, and Idaho Office of Emergency Management and provided each with tailored briefings, but the planning team did not record the time and content of those briefings. Records of consequence assessment communications with emergency decision-makers are used in post-incident investigations. (See **OFI-BEA-5.**)

### **Consequence Assessment Conclusions**

Overall, BEA adequately demonstrated the ability to provide conservative consequence assessment of incident conditions. The planning team effectively provided analysis on the evolution of the wildland fire and the impact of smoke on roads and evacuation routes. However, BEA's lack of integration of consequence assessment results in the iMap system diminished the shared information across the ERO and limited the ability of other emergency responders to use the team's output for consequence-based decision-making. Also, consequence assessment personnel did not make a record of providing consequence assessment results to all emergency decision-makers.

### **3.6 Offsite Response Interfaces**

This portion of the assessment evaluated the effectiveness of BEA and DOE-ID in establishing and maintaining interfaces with local, state, tribal, and Federal organizations responsible for emergency response.

BEA demonstrated effective interfaces with local, state, tribal, and Federal organizations responsible for emergency response. The emergency plan adequately documents the partnerships and agreements with local, state, tribal, and Federal agencies. During the exercise, representatives for the State of Idaho's Department of Environmental Quality and Office of Emergency Management responded to both the EOC and the ICP for situational awareness and to provide state oversight of the response. Representatives from the state agencies and the BLM integrated into the BEA incident command, providing concurrence on BEA response plans and actions. BLM also provided response assets during the exercise, including an incident command staff that joined with BEA in a UC with the IC from the BEA fire department. Also, the BEA fire department operated adequately with the BLM in a UC during the exercise. The exercise also demonstrated effective coordination with external medical resources, including a helicopter ambulance and hospital.

### **Offsite Response Interfaces Conclusions**

BEA demonstrated effective interfaces with local, state, tribal, and Federal organizations responsible for emergency response.

### **3.7 Emergency Public Information**

This portion of the assessment determined whether emergency public information staff provided accurate, candid, and timely information to workers, the media, and the public related to an INL incident response, and whether that information facilitated situational awareness to support a well-coordinated, well-understood, and effective response.

During the exercise, DOE-ID and BEA adequately implemented emergency public information processes to disseminate timely public information and warnings. In addition, DOE-ID activated the JIC, located in the INL Administration Building, Idaho Falls, as the centralized location for coordinating the release of accurate and timely information to the public and media, and was appropriately staffed as outlined in the emergency plan.

Emergency information for news media, public consumption, and employee notifications was disseminated through and managed appropriately from the JIC in coordination with DOE-ID and BEA per the emergency plan. The JIC adequately responded to inquiries from the simulated media and public concerning the incident, and supported the identification, control, and correction of rumors and misinformation on social media through web-based platforms used during the exercise.

Three press releases were generated during the exercise. DOE-ID maintained communication with DOE-ID and BEA personnel through the issuance of each press release that delivered the requisite information to inform employees about emergency conditions, including facility status, response and recovery actions, and offsite activities. However, while appropriately coordinated with the DOE-ID ED, press release 3 did not reflect a full understanding of vehicle accident-related injuries. Though the ED removed the vehicle accident-related injuries information during his review, once released, press release 3 stated that the vehicle accident had occurred while simultaneously stating in the “Background” section that “No structural damage or injuries have been reported.” (See **OFI-BEA-6**.) Subsequently, BEA provided accurate vehicle accident-related injuries information during the mock news press conference.

### **Emergency Public Information Conclusions**

Overall, emergency public information activities resulted in the issuance of routine communications with appropriate media counterparts and other stakeholders. DOE-ID and BEA effectively implemented emergency public information related plans, procedures, and checklists to ensure that the JIC disseminated relevant information to internal personnel, external stakeholders, and the media. Although press release 3 contained information that contradicted facts related to the vehicle accident-related injuries that occurred, the press conference appropriately corrected the information.

### **3.8 Exercise Design and Conduct**

This portion of the assessment evaluated the ability of the BEA exercise program to validate emergency response capabilities and test and validate emergency plans and procedures for hazards identified in the emergency planning hazards assessments.

BEA adequately developed and conducted an annual exercise to demonstrate a formal exercise program to validate ERO capability, except for a few weaknesses in exercise design and conduct. Although the postulated incident did not involve the release of hazardous material, it provided a challenge to the ERO with a multi-day and multiple-facility scenario, which included an ERO shift turnover. The scenario impacted both BEA and IEC facilities, permitting assessment of facility ECC communications with the EOC. Per plans and procedures, BEA conducted controller and evaluator briefings, held hot washes at each venue, and conducted an evaluator meeting. In addition, Argonne National Laboratory’s Public Affairs Science and Technology Fusion Cell staff provided a team to simulate a realistic interface with the public, media, and other stakeholders to convey routine response-related updates, and appropriately coordinated news releases, employee updates, and other internal communications. Of note, when the CFA EAM did not categorize the incident as anticipated, BEA permitted the ERO to work through the initial incident categorization with minimal changes beyond the planned injects in accordance with the master sequence of events list. The exercise conduct enabled accurate evaluation of the categorization

process, which resulted in the ED categorizing the incident based on the same information provided to the CFA EAM minutes after transfer of categorization responsibilities.

Nevertheless, the exercise plan lacked some details necessary for seamless control of the exercise. On June 10, 2025, BEA simulated the fire department response with a control cell so that fire department response resources were not dedicated to the exercise in the event of a fire; however, a routine fire department EMS response still caused a 40-minute delay in the exercise. In addition, the exercise plan, which simulated the INL's 2019 Sheep Fire, lacked pre-scripted injects for the fire department control cell detailing the evolution of the fire. The CFA ECC responders had full video coverage capability of the fire location with zoom features that would have provided the CFA ECC staff with additional information related to the fire's progression. BEA did not provide any photos on June 10, 2025, depicting the CFA's video capability. BEA provided fire status photos on June 11, 2025, but they were not preplanned injects cited in the exercise plan.

### **Exercise Design and Conduct Conclusions**

BEA adequately designed and conducted an annual exercise in accordance with its plans, procedures, and checklists that challenged ERO capabilities and resources with a multi-day, multiple-facility exercise. In addition, the Argonne National Laboratory's staff participation in the simulation cell added overall realism to the exercise. However, BEA did not adequately develop a comprehensive exercise plan to promote seamless control of the exercise.

### **3.9 Follow-up on Previous EA Findings**

This portion of the assessment determined whether corrective actions were effective for the two findings identified in EA report *Independent Assessment of Emergency Management at the Idaho National Laboratory, April 2022*.

In 2021, EA conducted an independent assessment to appraise emergency management program effectiveness at INL during its annual site-level exercise. The EA assessment identified two findings: 2022 EA Finding F-BEA-1 and 2022 EA Finding F-BEA-2. BEA determined that an apparent cause analysis of the two findings was not necessary.

2022 EA Finding F-BEA-1 identified that BEA did not demonstrate an effective EOS that validates and coordinates incident information to establish and maintain situational awareness and a common operating picture among response components. (DOE Order 151.1D, attachment 3, paragraph 4). BEA addressed the issue as follows:

- A formal corrective action plan was developed and approved.
- PLN-6641, *INL Emergency Management Emergency Operations System*, was developed and issued to establish a process for an EOS.
- ERO personnel were trained on PLN-6641.
- The 2022 BEA-assessed annual drill validated adequate ERO performance by establishing and maintaining situational awareness and a common operating picture among response components.
- BEA also performed an analysis of the last three independent assessments conducted by EA (2012, 2018, and 2021).
- All corrective actions for 2022 EA Finding F-BEA-1 were completed, and the finding was closed.

2022 EA Finding F-BEA-2 identified that BEA did not demonstrate a reliable and effective information management system to support emergency response operations. (DOE Order 151.1D, attachment 3, paragraph 10). BEA addressed the issue as follows:

- A formal corrective action plan was developed and approved.
- Immediate action was taken with the software vendor for WebEOC (Juvare), and the performance issue was identified and fixed. Prior to identification of the issue, Juvare had set a default of 20-40 users at a time in WebEOC. BEA increased the number of users to 150, with a standing availability of 250, if needed.
- BEA assessed the performance of WebEOC on June 1, 2022, with 109 users logged in and verified that the issue was resolved.
- EPIP EPI-82, *Emergency Information Management System*, was revised to provide instructions on what to do if WebEOC fails; however, there was no record available to demonstrate that BEA had verified the effective implementation of the procedure.
- All corrective actions for 2022 EA Finding F-BEA-2 were completed and the finding was closed.

BEA completed all corrective actions to address the two previous EA findings. During the June 2025 site-level exercise, EA observed the recurrence of some communication and ERO performance weaknesses among response facilities, field response elements, and offsite command centers. Consequently, as previously discussed in section 3.1, BEA did not maintain a common operating picture of the emergency response and shared situational awareness among all teams; though, during the June 2025 site-level exercise, EA observed a reliable and effective WebEOC information management system to support emergency response operations.

#### **Follow-up on Previous EA Findings Conclusions**

The corrective actions for 2022 EA Finding F-BEA-1 were not adequate as demonstrated by the issue recurrence during the 2025 site-level exercise. The corrective actions for the 2022 EA Finding F-BEA-2 were adequate.

#### **4.0 BEST PRACTICES**

No best practices were identified during this assessment.

#### **5.0 FINDINGS**

Findings are deficiencies that warrant a high level of attention from management. If left uncorrected, findings could adversely affect the DOE mission, the environment, the safety or health of workers and the public, or national security. DOE line management and/or contractor organizations must develop and implement corrective action plans for findings. Cognizant DOE managers must use site- and program-specific issues management processes and systems developed in accordance with DOE Order 226.1, *Implementation of Department of Energy Oversight Policy*, to manage the corrective actions and track them to completion.



## **Battelle Energy Alliance, LLC**

**Finding F-BEA-1:** BEA did not demonstrate an effective EOS that validates and coordinates incident information to establish and maintain situational awareness and a common operating picture among response components. (DOE Order 151.1D, att. 3, par. 4)

**Finding F-BEA-2:** BEA did not categorize the incident as promptly as possible, but no later than 15 minutes after identification by the predetermined decision-maker for the categorization, and no more than 30 minutes from initial discovery. (DOE Order 151.1D, att. 3, par. 8.b)

**Finding F-BEA-3:** BEA did not provide complete and accurate initial and follow-up notifications to all appropriate stakeholders. (DOE Order 151.1D, att. 3, par. 11.a)

## **DOE Idaho Operations Office**

**Finding F-DOE-ID-1:** DOE-ID has not established an individual ERO position with the authority to implement the site emergency management plan to include management and control of all aspects of the site response and has not ensured an integrated and comprehensive emergency management system between BEA and IEC that can respond effectively and efficiently to all OEs so that appropriate response measures are taken to protect workers, the public, the environment, and national security. (DOE Order 151.1D, par. 4.a.(1) and att. 3, par. 3.c.)

## **6.0 DEFICIENCIES**

No deficiencies were identified during this assessment.

## **7.0 OPPORTUNITIES FOR IMPROVEMENT**

EA identified the OFIs shown below to assist cognizant managers in improving programs and operations. While OFIs may identify potential solutions to findings and deficiencies identified in assessment reports, they may also address other conditions observed during the assessment process. These OFIs are offered only as recommendations for line management consideration; they do not require formal resolution by management through a corrective action process and are not intended to be prescriptive or mandatory. Rather, they are suggestions that may assist site management in implementing best practices or provide potential solutions to issues identified during the assessment.

## **Battelle Energy Alliance, LLC**

**OFI-BEA-1:** To improve timely and appropriate categorization during an incident, consider the following actions:

- Revising and minimizing EALs that contain conditions that are subjective in nature and contain terms subject to interpretation by the decision-maker.
- Having an individual who is qualified to categorize and classify incidents review the exercise plans to ensure adequate injects for EAMs and EDs to promptly categorize and classify incidents.
- Revising section 5 of PLN-114 to be consistent with EPI-10 and EPI-25 stating that the CFA EAM categorizes wildland fires anywhere on the INL site.

- Revising section 5 of PLN-114 to clarify, for incidents during which categorization and classification authority is transferred to the ED, whether this applies to all EAMs or only the one EAM who transferred the authority.

**OFI-BEA-2:** To improve the situational awareness of PAs implemented on site, consider the following actions:

- Developing a summary board within WebEOC to capture the status of the various facilities.
- Designating an individual within the ERO whose primary job is to maintain situational awareness of the PAs at various facilities and to troubleshoot conflicting reports.

**OFI-BEA-3:** To improve the accuracy of offsite notifications, consider the following actions:

- Ensuring that the notification form contains all information required by DOE Order 151.1D, attachment 3, paragraph 11.a.(6).
- Designing an electronic notification form that can be filled out by the EAMs and transmitted to the ED for review, approval, and issuance.
- Designating an individual within the ERO who is responsible for calling the DOE Headquarters Watch Office and reporting initial emergency information to the DOE Headquarters Watch Officer.

**OFI-BEA-4:** Consider developing a common operating picture capability within the iMap system to allow multiple users to input geographic information onto a single view.

**OFI-BEA-5:** Consider developing procedural steps to document briefings and communications to state, local, and tribal government officials to capture the time, place, and a summary of the content of the briefings or communications.

**OFI-BEA-6:** Consider incorporating additional steps in emergency public information checklists and conducting additional training to ensure that press releases do not provide misinformation related to facts of an event being reported.

## **DOE Idaho Operations Office**

**OFI-DOE-ID-1:** To improve the INL emergency management concept of operations, consider the following actions:

- Developing and implementing a lead and event contractor concept of operations, similar to existing configurations within the DOE complex at the Hanford Site, Los Alamos National Laboratory, Oak Ridge National Laboratory, the Savannah River Site, and the Y-12 National Security Complex. Under this configuration, BEA would be the lead contractor and IEC would be an event contractor, with overall responsibilities as follows:
  - The lead contractor is responsible for the overall emergency response and staffs the majority of ERO positions.
  - The lead contractor provides the 24/7 notification point (i.e., the WCC).
  - The lead contractor provides a 24/7 duty officer in the WCC, who serves as the site ED until response decision-making is transferred to the EOC.
  - The lead contractor develops the emergency plan and EPIPs.

- The lead contractor provides funding and maintains site-level response resources for INL based on the hazards identified in the hazard surveys and emergency planning hazards assessments.
- Event contractors operate facilities and perform functions within the INL site.
- The event contractor is responsible for the emergency program within its respective operating facilities in accordance with the emergency plan and EIPs.
- The event contractor is responsible for supporting site response, including event classification, notifications, PA decision-making, worker protection, mitigation, and technical support.
- Event contractor facilities' emergency programs are integrated with the lead contractor's emergency management program.
- During an incident at the event contractor's facility, a Facility Representative and staff are activated and report to the EOC, regardless of whether the incident is classified. The event contractor supports the incident command and site response.
- Assign BEA responsibility for incident command in accordance with NIMS, and the BEA IC applies the necessary resources (e.g., hazardous material, security, emergency medical, health and safety, and facility/operations managers) to mitigate the event at the scene.
- Assign facility-level EROs, both lead and event contractors, operational response duties within their jurisdiction, including response to abnormal events and interface with incident command and managed by operations managers/EAMs. Basic responsibilities are:
  - EAMs perform initial emergency categorization and classification, facility ERO command and control, and PA decision-making for the facility.
  - EAMs initiate implementation of the emergency plan and EIPs; maintain command and control of facility and area operations, and coordinate response activities with the IC, who is responsible for response activities at the event scene.
  - EAMs report incident information to either the WCC duty officer or the ED in the EOC when the EOC is operational.
- Assign BEA responsibility for site level response, initially directed by the WCC duty officer, which is the 24/7 point of contact for INL. Basic responsibilities are:
  - When an emergency occurs at INL, personnel notify the WCC. The WCC duty officer evaluates the emergency and, if necessary, supports the initial categorization of the incident and determines the proper emergency classification in accordance with EALs.
  - The WCC duty officer becomes the INL ED when the event has been categorized as an OE and remains in this role until relieved by the EOC ED.
  - The WCC duty officer, who is supported by emergency communication specialists, manages the initial site-level response actions, such as dispatching the fire department and protective force personnel to incident scenes.
  - The WCC also activates the site-level ERO, provides offsite notifications, directs PAs for areas beyond a facility boundary around a hazardous material release and downwind affected areas, and adjusts the protective force barricade locations.
  - Once the INL EOC is operational, the onsite and offsite activities and responses transition to the EOC ED.
- The ED is the designated individual ERO position authorized to implement the emergency plan and integrate all response venues, regardless of contractor affiliation.

## **Appendix A Supplemental Information**

### **Dates of Assessment**

May 1 to July 23, 2025

### **Office of Enterprise Assessments (EA) Management**

John E. Dupuy, Director, Office of Enterprise Assessments  
William F. West, Deputy Director, Office of Enterprise Assessments  
Kevin G. Kilp, Director, Office of Environment, Safety and Health Assessments  
David A. Young, Deputy Director, Office of Environment, Safety and Health Assessments  
Brent L. Jones, Acting Director, Office of Nuclear Safety and Environmental Assessments  
David Olah, Director, Office of Worker Safety and Health Assessments  
Jack E. Winston, Director, Office of Emergency Management Assessments  
Brent L. Jones, Director, Office of Nuclear Engineering and Safety Basis Assessments

### **Quality Review Board**

William F. West, Advisor  
Kevin G. Kilp, Chair  
Christopher E. McFearin  
Kimberly A. Kelly  
William A. Eckroade

### **EA Assessment Team**

Dr. Wade W. Gough, Lead  
Anthony D. Parsons  
John D. Bolling  
Dirk L. Foster  
Robert F. Gee  
Charles J. Rives  
William J. Scheib

**Appendix B**  
**Office of Nuclear Energy Response**

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**Department of Energy**  
**Idaho Operations Office**

December 4, 2025

MEMORANDUM FOR JOHN E. DUPUY

OFFICE OF ENTERPRISE ASSESSMENTS

FROM:

ROBERT BOSTON  
MANAGER

A handwritten signature in black ink, appearing to read "Robert Boston", is written over the printed name.

SUBJECT:

Management Response to Office of Enterprise Assessments  
Independent Assessment of the Idaho National Laboratory  
Emergency Management 2025 Annual Exercise (CLN260103)

The Office of Nuclear Energy (NE) does not concur with the final report and disputes the report's identification of one Finding (F-DOE-ID-1) and the classification of three Deficiencies as Findings (F-BEA-1, F-BEA-2, and F-BEA-3). According to Department of Energy (DOE) O 227.1A, Independent Oversight Program, Findings warrant significant management attention due to potential adverse effects on the DOE mission, environment, worker safety, public, or national security. Over classification of Opportunities for Improvement or Deficiencies as Findings results in needless, transactional oversight by the Office of Enterprise Assessments (EA) from corrective action development to confirming closure of the findings. Annual exercises should challenge the Emergency Response Organization (ERO) capabilities and assessors should not expect flawless ERO execution. Performance Deficiencies on the part of ERO members that do not impact the response actions do not reveal a failure of the Emergency Management Core Program requirements and do not adversely affect the DOE mission, the environment, worker safety or health, the public or national security.

During the assessment report coordination, the assessors stated that their threshold for classifying Findings has not changed and is consistent across the site. However, unlike the deficiencies in 2025, the deficiencies in the 2022 assessment resulted in incorrect evacuation routes, untimely notification to field workers to take protective actions, and inadequate situational awareness with fundamental information of the incident location, staging, access control points, etc. which clearly would have an adverse effect on worker safety or health. Additional discussion on each finding is provided as follows:

**F-DOE-ID-1** “DOE-ID has not established an individual ERO position with the authority to implement the site emergency management plan to include management and control of all aspects of the site response and has not ensured an integrated and comprehensive emergency management system between [Battelle Energy Alliance, LLC.] BEA and [Idaho Environmental Coalition, LLC.] IEC that can respond effectively and efficiently to all OEs so that appropriate response measures are taken to protect workers, the public, the environment, and national security.”

No Deficiency exists. The EA assessors appear to not understand the multi-contractor site response structure. Fundamentally, one prime contractor cannot direct another prime contractor to take actions that incur a cost to the government. DOE-ID's Management Duty Officer (MDO) acts as the Senior Federal Official at the Emergency Operations Center (EOC) and can assume command and give direction if necessary. While the BEA Emergency Director cannot direct other contractors, senior leaders from all site contractors are represented in the EOC, enabling effective communication and coordination. This system has proven effective for decades in multiple site-wide emergencies.

**F-BEA-1** “BEA did not demonstrate an effective [Emergency Operating System] EOS that validates and coordinates incident information to establish and maintain situational awareness and a common operating picture among response components.”

F-BEA-1 is a verbatim repeat of the 2022 EA assessment and is a recurring theme throughout the complex. Despite BEA having adequate EOS capabilities, the assessors identified a discrepancy between emergency notifications from the Radioactive Waste Management Complex (RWMC) ECC and the EOC as a justification for this Finding. It should be expected that a two-day annual exercise of this scope and complexity (a multi-agency response to a wildland fire affecting multiple site areas operated by different contractors, a loss of off-site power, and a vehicle accident with LifeFlight response) along with several real Idaho National Laboratory (INL) Fire Department responses may challenge the common operating picture among response components. However, the performance deficiency of the ERO during the exercise did not affect the response actions and does not reveal a failure of the Emergency Management Core Program requirements nor adversely affect the DOE mission, the environment, worker safety or health, the public or national security. Furthermore, this performance deficiency does not justify keeping the 2022 EA Finding F-BEA-1 open.

**F-BEA-2** “BEA did not categorize the incident as promptly as possible, but no later than 15 minutes after identification by the predetermined decision-maker for the categorization, and no more than 30 minutes from initial discovery.”

Based on the information provided to the Emergency Action Manager (EAM), the EAM concluded that there was no imminent threat to facilities. Although this led to a delayed categorization, the correct protective actions were being implemented, and mutual aid agreements were initiated immediately with the INL Fire Department and local agencies.

All appropriate safety precautions were taken for employee safety and incident mitigation. Once information was provided that the fire was approaching the Materials and Fuels Complex (MFC), the categorization was promptly made. Therefore, this performance deficiency did not adversely affect the DOE mission, the environment, worker safety or health, the public or national security.

**F-BEA-3** “BEA did not provide complete and accurate initial and follow-up notifications to all appropriate stakeholders.”

All notifications were sent out to all appropriate agencies. This Finding was based on the Warning Communication Center calling the DOE Headquarters (HQ) Watch Office to verify receipt of the notification email but not including a discussion of incident-specific information with the DOE HQ Watch Officer. The lack of a follow-up discussion with the DOE HQ Watch Officer does not adversely affect the DOE mission, the environment, worker safety or health, the public or national security.

If you have any questions or comments on the contents of this memorandum, please contact Mike McAnulty at (208) 360-3086.