

2. OFFSITE RESPONSE INTERFACES

2.1 Introduction

Interface with offsite agencies and organizations is an integral part of the DOE Comprehensive Emergency Management Program. DOE has committed to comply with Federal, state and local regulations pertaining to protecting workers and the public in the event of an emergency. Many of these regulations have provisions which require the establishment of interfaces between organizations having responsibility for emergency response. For purposes of this Guide, an interface means a dialog to discuss emergency response roles, responsibilities, capabilities, notification procedures, and information needs. Interfaces are usually maintained through a designated point of contact within each organization.

The results of the Hazards Surveys and Hazards Assessments are used to help identify all agencies and organizations (e.g., local, state, and Federal) necessary to support a comprehensive, integrated response. Appropriate interfaces should be established, documented, and tested with each agency and organization.

Under Federal environmental regulations, each state is required to establish a State Emergency Response Commission (SERC). The SERC is charged with designating emergency planning districts, appointing Local Emergency Planning Committees (LEPCs) for each district, and coordinating their activities. The LEPCs are charged specifically with integrating and coordinating community emergency planning. These requirements are further defined in 40 CFR 300, Subparts B and C. SARA Title III, Emergency Planning and Community-Right-to-Know Act (EPCRA), provides regulations on offsite interface regarding hazardous materials

To establish and maintain offsite interfaces, regular facility/site meetings with offsite officials should be held to discuss areas of concern and changes to emergency response procedures. These meetings can also be used to develop emergency public information and outreach programs. SERC/LEPC meetings could be used as a forum for these discussions.

The first section of this chapter addresses the identification of needed interfaces and the type of information support agreements should contain. The second section discusses the documentation that should be provided and maintained to establish and maintain long term support agreements.

Base Program. The level of offsite coordination required to support a Base Program is not unique to a DOE site/facility. The requirements for offsite interfaces with fire, HAZMAT, medical, and law enforcement services are essentially the same as would apply to a non-DOE facility. As a result, even though this chapter is focused on the more extensive needs of the Hazardous Materials Program, the guidance provided is also applicable to a Base Program.

2.2 Offsite Organizations

Agencies and organizations responsible for protecting the public and the environment within the vicinity of the facility/site should be identified. These agencies and organizations should be contacted to determine authorities, responsibilities, notification procedures, and information necessary in the event of an emergency at the DOE facility. Requirements identified during the Hazards Survey and/or Hazards Assessment process should be used to help determine all necessary local, state and federal interfaces.

Hazards Survey/Assessment results should be used to generate a listing of all services which may be needed to respond to postulated accident conditions. Examples of services which may be required include hospitals, fire departments, law enforcement, accident investigation, analytical laboratory services, ambulance services, coroners, suppliers, contractors, and others. Services needed should be checked against the capabilities of the identified interface organizations and agencies to ensure all are addressed. An interface should be established with each entity from which support will be needed and appropriate agreements prepared. For multiple-facility/sites, the contractor and Operations/Field Office with site-wide responsibility should provide centralized point of coordination. The agreement should contain, at a minimum, the following information:

- The specific service to be provided.
- Point of contact and information required to initiate the service.
- Any constraints which might preclude the organization from meeting its obligation.
- Public information release protocols.
- Financial arrangements, including commitments by the facility/site to provide training, equipment, and facilities to the entity providing the service. Considerations include indemnification for injury to persons or loss and damage to property.
- Periodic re-examination of the provisions and a renewal or termination date.

If a facility/site is to provide support to an offsite agency under the “good neighbor” policy or through mutual aid agreements, those support interfaces should be documented.

In addition, DOE radiological emergency response assets are available to support offsite officials in the event of a radiological incident. Facilities/sites should coordinate with offsite officials to provide information on the availability and capabilities of DOE radiological emergency response assets (see also Volume VIII.)

Facility/site plans should describe integrated support from other offsite response organizations responding to emergencies. The organizations may include groups from outside the facility/site EPZ that respond under provisions of the Federal Radiological Emergency Response Plan (FRERP) for radiological emergencies; the National Oil and Hazardous Substances Pollution Contingency Plan, also known as the National Contingency Plan (NCP), for oil and nonradiological hazardous material emergencies; or the Federal Response Plan (FRP), if the situation is declared an emergency or major disaster by the President. If the county(ies) is declared a Presidential disaster area and the FRP is activated, FEMA will establish a Disaster Field Office (DFO), from which Federal and State personnel will coordinate activities.

2.3 Documentation

Arrangements with state, tribal, and local governments should be documented in the facility/site emergency plan. All agreements (e.g., Memoranda of Understanding [MOU], Memoranda of Agreement [MOA], Agreements in Principle, and State Oversight Agreements) with emergency management/response provisions should be consistent and contain provisions for periodic review to ensure continued applicability. The arrangement(s) should address:

- (1) Identification and responsibilities of all parties and participants, including the method for coordination and control of an emergency, in accordance with Incident Command Systems (ICS) procedures.
- (2) Identification of specific points of contact and a description of information in notifications and follow-on activities (cf. Volume III, Chapter 4).
- (3) Descriptions of actions by the parties for each type/classification of Operational Emergency. Emergency Planning Zones and Emergency Action Levels (EALs) for Operational Emergency Hazardous Materials Programs should be described and include criteria for protective action recommendations to permit a clear and full understanding among parties.
- (4) Agreement for liaisons and corresponding allocation of space in the Emergency Operations Centers (EOCs) of parties.

- (5) Communication interfaces/protocols for notification points, EOCs, responders, monitoring teams, and other entities involved in the emergency response. Public warning activities (e.g., sirens) should also be described.
- (6) Descriptions of public information activities, including site/facility press release protocols and the name or position of personnel authorized to speak for each organization during an emergency.
- (7) Descriptions of operational interfaces between EOCs, including an organization chart depicting points of interface among parties.
- (8) Description of training activities, including beyond-the-basic emergency response training needs required to respond to site-specific conditions and hazards. Additional training needs should be identified and arranged.
- (9) Each DOE facility/site is required to offer offsite response organizations the opportunity to participate in an exercise every three years. This section should discuss formulation of exercise objectives and exercise scenarios to accommodate these objectives. This section should also address agreed-upon schedules for development of exercise milestones.
- (10) Details of separate MOUs or agreements with fire services, hospitals, ambulance services, and other organizations supporting the facility and the public.
- (11) The assumptions made by the facility as a basis for public protection planning should be clearly identified. The actions anticipated by each interface agency should be stated and information required to effectively respond should be identified.

2.4 Bibliography

DOE O 232.1A. *Occurrence Reporting and Processing of Operations Information*. 7-21-97.

PUBLIC LAW 99-499. *Superfund Amendments and Reauthorization Act (SARA)*. Which includes SARA Title III. *Emergency Planning and Community Right-to-Know Act (EPCRA)*.

Title 40 CFR 300. *National Oil and Hazardous Substances Pollution Contingency Plan*.

Title 61 FR 28583. *Federal Radiological Emergency Response Plan*. May 8, 1996.

Federal Response Plan. April 1992.

Acronyms

DFO	Disaster Field Office
EAL	Emergency Action Levels
EOC	Emergency Operations Centers
FRERP	Federal Radiological Emergency Response Plan
FRP	Federal Response Plan
ICS	Incident Command Systems
LEPC	Local Emergency Planning Committee
MOA	Memoranda of Agreement
MOU	Memoranda of Understanding
NCP	National Contingency Plan
SERC	State Emergency Response Commission

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