

memorandum

Savannah River Operations Office (SR)

DATE: OCT 1 2007

REPLY TO

ATTN OF: TSD (Gentry, 803-952-7153)

SUBJECT: Submission of SRM 400.1.1C, "DOE-SR Integrated Safety Management System (ISMS) Description Manual" (Your Memorandum dated 5/25/07)

TO: James Rispoli, Assistant Secretary for Environmental Management (EM-1), HQ

I am submitting the subject document in accordance with the direction you provided on May 25, 2007. This document has been revised to reflect organizational changes within DOE-SR and updates references to DOE-SR and DOE-HQ directives. In addition, the four new safety culture principles discussed in DOE M 450.4-1 (approved November 1, 2006) have been added to the document. Finally, the document briefly describes implementation of 10 CFR 851 at the Savannah River Site.

Questions from you or your staff may be directed to me or Yvonne Gentry at (803) 951-7153.



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Manager

TSD:YBG:dmy

OSQA-07-0146

Attachment:
DOE-SR ISMS Description Manualcc w/o attachment:
Dr. Inés R. Triay, EM-2

Department of Energy Savannah River Site (DOE-SRS) Integrated Safety Management System (ISMS) Description Manual



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EFFECTIVE DATE: 10/1/07

PRIMARY DIVISION/OFFICE: Technical Support Division

CHANGE SUMMARY LOG

Description of Change	Effective Date
<p>This revision cancels SRM 400.1.1B and discusses the following:</p> <ul style="list-style-type: none">• DOE-SRS implementation of the Integrated Safety Management System;• DOE-SRS directives that reflect the ISMS processes and requirements,• Identification of other policies, procedures, manuals and directives where various mechanisms used in safety management are located,• Title changes reflecting the nomenclature as stated in DOE M 450.4-1, and• The four "Supplemental Safety Culture Elements" from DOE M 450.4-1, Attachment 2.	

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TITLE: SAFETY MANAGEMENT SYSTEM DESCRIPTION MANUAL

1.0 PURPOSE AND SCOPE

1.1 PURPOSE

1.1.1 The purpose of this Manual is to describe the Department of Energy (DOE) Savannah River Operations Office (SR) Integrated Safety Management System (ISMS). This Manual provides an overview describing how various parts of the Integrated Safety Management System fit together. Specific requirements for each of the ISMS core functions and principles are set forth in other implementing procedures and manuals. This Manual relies upon the following DOE-SRS directives to provide the description and specifics of ISMS actions involving oversight of contractor assurance systems, radiological waste management, fire protection and environmental management systems:

- Savannah River Manual (SRM) 226.1.1A, "Integrated Performance Assurance Manual," defines the DOE-SRS oversight processes and assures compliance with contract requirements; provides for timely identification and correction of deficient conditions; verifies effectiveness of completed corrective actions; and pursues excellence through continued improvement.
- Savannah River Manual (SRM) 435.1.1B, "Radioactive Waste Management Manual", provides DOE-SRS personnel with instructions for implementing the requirements of DOE Order 435.1, "Radioactive Waste Management", to ensure that all radioactive waste is managed in a manner that is protective of workers and public health and safety and the environment.
- Savannah River Implementing Procedure (SRIP) 440.1, "DOE-SR Fire Protection", establishes the DOE-SRS fire protection program required by DOE O 420.1B and DOE O 440.1B to support and maintain a level of fire protection and fire suppression capability sufficient to minimize losses from fire and related hazards.
- SRIP 450.1, "DOE-SR Environmental Protection Program", establishes the responsibilities of and the methods to be used by DOE-SRS personnel in providing direction and oversight for the effective management of the Environmental Protection Program at the Savannah River Site (SRS), a program that ensures activities and work performed at SRS comply with requirements and regulations and are conducted in an environmentally safe and sound manner.

- DOE-SRS is organized to do work through contracts. Some of the processes and procedures used to perform DOE-SRS safety management functions are those that belong to its contractors. These processes and procedures, such as the Unreviewed Safety Question (USQ) Procedure, Standards/Requirements Identification Documents (S/RIDs), Radiation Protection Plan (RPP), Occurrence Reporting and Processing System (ORPS), and the Remote Worker Program are DOE-SRS approved and/or under its oversight. These processes and procedures are included in the description of the DOE-SRS ISMS. A full description of these contractor processes and procedures is provided in the contractors' Integrated Safety Management System (ISMS) description documents, S/RIDs, and various other procedures.

1.2 SCOPE

- 1.2.1 DOE-SRS has overall responsibility for the SRS. In the performance of this responsibility, DOE-SRS exercises its authority to establish and enforce occupational safety and health standards applicable to work conditions of contractor employees performing work at the SRS. **Contractor** means any entity, including affiliated entities, such as a parent corporation, under contract with DOE, or a subcontractor at any tier, that has responsibilities for performing work at a DOE site in furtherance of a DOE mission (10 CFR 851). DOE-SRS accomplishes this by ensuring formal arrangements are developed to authorize work to be performed at the SRS. Additionally, DOE-SRS performs compliance oversight of SRS activities to ensure these requirements for performing work are being adhered to. These formal arrangements are the starting point for achieving safe work by establishing an adequate safety framework and commitments to performing work safely. A safety framework provides the requirements for integrating the management of environment, safety, and health functions and activities into the processes for planning and executing work.
- 1.2.2 The provisions of this manual apply to all DOE-SRS organizational elements. The provisions of this document also apply to the National Nuclear Security Administration – Savannah River Site Office (NNSA-SRSO) as defined in Memorandum RA-07-032, Arkin to Allison, “SRSO Adoption of Department of Energy, Savannah River Operations Office Manuals, Procedures, and Policies”, dated 10-05-06 (as amended); and SV-MOA-001, “Agreement of Safety Management at Savannah River Site”, dated 04-20-07 (as amended); approved by the Manager, DOE-SR and Manager, SRSO. NNSA-SRSO is an active member of the DOE-SR Executive Technical Management Board (ETMB), DOE-SR Nuclear Safety Council, DOE-SR Facility Representative Council (FRC), and the Emergency Response Organization.
- 1.2.3 The provisions of this manual also apply to the NNSA’s “Office of Site Engineering/ Construction Management, NA-262,” as delineated in the following references: (1) “Agreement on Safety Management at the Savannah River Site” between NNSA Fissile Materials Disposition Office and DOE-SR, dated 10-14-05; (2) “Fissile Materials Disposition Activities at the Savannah River Site,” MOU between the Assistant Deputy Administrator for Fissile Materials Disposition (NA-26) and the Manager, SRSO, dated 10-2-06.

NA-262 will also develop and follow additional “mechanisms” as necessary to implement the Departmental Policy on ISMS.

2.0 REFERENCES

2.1 SOURCE REQUIREMENT DOCUMENTS

- 2.1.1 SRM 226.1.1, “DOE-SR Integrated Performance Assurance Manual (IPAM)”
- 2.1.2 SRIP 251.2, “Oversight of Contractor S/RID Activities”
- 2.1.3 SRIP 421.1, “Nuclear Safety Oversight”
- 2.1.4 SRM 130.2.1, “Management Plan for Planning, Budgeting, Work Authorization, and Control”
- 2.1.5 SRM 300.1.1, Chapter 1, Section 1.1, “SR Functions, Responsibilities and Authorities Procedure”
- 2.1.6 SRM 300.1.1, Chapter 1, Section 1.2, “DOE-SR Organizational Configuration Control Process”
- 2.1.7 SRM 300.1.1, Chapter 2, Section 2.1, “DOE-SR Position Management and Classification Process
- 2.1.8 SRM 300.1.1, Chapter 3, Section 3.1, “DOE-SR Merit Promotion and Placement Process”
- 2.1.9 SRM 300.1.1, Chapter 5, Section 5.2, “DOE-SR Performance Management Process”
- 2.1.10 SRM 300.1.1, Chapter 6, Section 6.1, “DOE-SR Technical Qualification Program and Acquisition Career Development Program Process Procedure”
- 2.1.11 SRM 435.1.1, “Radioactive Waste Management Manual”
- 2.1.12 SRIP 442.2, “Resolution of Differing Professional Opinions for Technical Issues Involving Environment, Safety or Health”
- 2.1.13 SRP 06-02, “DOE-SR Safety Integration of Early Design Phases”
- 2.1.14 SRP 05-03, “SRS Workplace Safety, Health and Security Policy”
- 2.1.15 SRP 05-04, “SRS Environmental Management System Policy”

2.2 INTERFACE DOCUMENTS

- 2.2.1 M&O Contract Number DE-AC09-96SR18500, Modification Number M-161
- 2.2.2 Memorandum, Golan to Allison, Delegation of Authority, dated 8-12-04
- 2.2.3 DOE M 411.1-1, Safety Management, Functions, Responsibilities, and Authorities Manual
- 2.2.4 Department of Energy Office of Environmental Management Safety Management Functions, Responsibilities, and Authorities Document (latest revision)

3.0 ACRONYMS (This manual utilizes the following acronyms):

AA	Authorization Agreements
DOE	Department of Energy
DOE-SR	Savannah River Operations Office (EM organizations)
DOE-SRS	All DOE entities at SRS including EM and NNSA organizations
DNFSB	Defense Nuclear Facilities Safety Board
DSA	Documented Safety Analysis
ETMB	Executive Technical Management Board
FR	Facility Representative
FRAP	Functions, Responsibilities, and Authorities Procedure
FRC	Facility Representative Council
HQ	Department of Energy-Headquarters
HRMDT	Human Resources management and Development Team
ISMS	Integrated Safety Management System
KPI	Key Performance Indicators
HPI	Human Performance Improvement
IPT	Integrated Project Team
ITP	Individual Training Plan
M&O	management and operating
MOU	Memorandum of Understanding
NNSA	National Nuclear Security Administration
OHCM	Office of Human Capital Management
PEP	Project Execution Plan
PMP	Performance Management Plan
P&DP	Performance and Development Plan
SERs	Safety Evaluation Reports
SR	Savannah River Operations Office
SRIP	Savannah River Implementing Procedure
S/RID	Standards/Requirements Identification Document
SRS	Savannah River Site
TQP	Technical Qualification Program
TSR	Technical Safety Requirement
USQ	Unreviewed Safety Question

WA/EP	Work Authorization/Execution Plan
WSI	Wackenhut Services, Incorporated
WSRC	Washington Savannah River Company

4.0 **BACKGROUND**

In 1995, the Defense Nuclear Facilities Safety Board (DNFSB) recommended that DOE institutionalize an integrated safety management system (ISMS) across the complex. DOE responded to that recommendation (DNFSB Recommendation 95-2) by issuing an implementation plan in April 1996, followed by DOE P 450.4, "Safety Management System", in October 1996.

DOE's ISMS establishes a hierarchy of components facilitating the orderly development and implementation of safety management throughout the complex. As described in DOE P 450.4, the ISMS consists of six components: (1) objective, (2) guiding principles, (3) core functions, (4) mechanisms, (5) responsibilities, and (6) implementation. The first three are the same for all DOE offices and contractors, while the latter three differ from site to site depending on hazards, work processes, and management styles.

4.1 **INTEGRATED SAFETY MANAGEMENT SYSTEM OBJECTIVE**

- 4.1.1 The objective of safety management is to ensure that DOE-SRS and its contractors systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the worker, the public, and the environment. The bottom-line objective is to **DO WORK SAFELY**.
- 4.1.2 The DOE-SR Functions, Responsibilities, and Authorities Procedure (FRAP) is a key component of the configuration control process for the assignment of safety management functions, responsibilities and authorities, as well as, providing the identification of the DOE-SR directives which implement them. The DOE-SR FRAP, SRIPs, SR policies (SRPs), SRMs, and the ISMS Description Manual are controlled and maintained current through the DOE-SR Directives System. The Performance Assurance Division (PAD), Office of Safety and Quality Assurance, includes these documents in their independent assessment process to ensure they remain up to date and properly implemented.
- 4.1.3 SRIP 440.3, "DOE-SR Federal Employee Occupational Safety and Health (FEOSH) Program", implements the requirements of 29 Code of Federal Regulations (CFR) 1960, "Basic Program Requirements for FEOSH Programs and Related Matters", and is directly applicable to office work performed by Federal workers at SRS. Many of the DOE-SRS employees also perform work outside an office environment. This work takes place in facilities and areas that are covered by the contractor's health and safety plans, programs, and procedures. DOE-SRS employees are responsible to be familiar with the hazards and be compliant with the work practices identified by the contractor for entry into these facilities and areas.

- 4.1.4 Integrated safety management of SRS activities approved by DOE-SRS starts with a proper legal foundation that clearly articulates and enforces the responsibilities and expectations for establishing and maintaining a safe environment to perform work in an environmentally compliant manner. All work conducted at the SRS must be accomplished in a manner that protects the public, the workers, the environment, and its security assets and related materials.
- 4.1.5 While a number of different contractual and non-contractual arrangements are used by DOE-SRS to authorize work at the SRS, all arrangements are common in their requirement for a safety framework to be established and followed to ensure the associated work is performed safely. All authorizing documents (e.g., contracts, interagency agreements, and cooperative agreements) must clearly state the commitment to safety as a primary consideration and must require the establishment of a safety framework to ensure work is performed safely. Additionally, these authorizing documents require organizations authorized to perform work at the SRS to flow down these safety requirements to their subcontractors and other arrangements they are allowed to enter into to perform work. DOE-SRS authority to perform unannounced inspections of work activities and to issue a "Stop Work" order is maintained in all arrangements that authorize work to be performed.
- 4.1.6 For DOE-SRS contracts, a defined safety framework shall be included. This is accomplished through the application of Federal Acquisition Regulations (FAR) and DOE Acquisition Regulations (DEAR) to the contracting process. DOE-SRS validates the safety framework. Safe performance of work is the responsibility of the contractor regardless if the work is performed directly or through others via subcontracts or other arrangements. DOE-SRS contracts require a contractor to flow down contract requirements and in specific safety requirements to all subcontracts and other arrangements that perform work through others.

Examples:

- A. **DOE-SR M&O contract with WSRC** - WSRC is required to have a safety framework that is provided by an ISMS. The WSRC ISMS is validated and approved by the Manager, DOE-SR. The WSRC contract clauses state that WSRC is responsible for the safe performance of all its work including work accomplished through others (e.g., subcontractors, vendors, etc.) and for the flow down of contract requirements to these arrangements. WSRC maintains DOE-SR's authority to perform unannounced inspections and to issue a "Stop Work" order for all of its arrangements to perform work.
- B. **Salt Waste Processing Facility (SWPF) Project** – DOE-SR has a contract with Parsons to design, construct, startup, and operate the SWPF for one year. The safety framework is developed and approved as an integral part of the Project Execution Plan (PEP) in accordance with DOE O 413.3A. The contract requires Parsons to develop and implement an ISMS that meets DOE requirements. The Parsons ISMS is validated and approved by the Manager, DOE-SR.

The contract requires Parsons to integrate safety into all activities, including those of subcontractors at all levels. Parsons is required to flowdown all applicable ESH&Q criteria to the lowest tier subcontractor performing construction, equipment fabrication, or commissioning. DOE-SR has the authority to perform unannounced inspections and to issue a "Stop Work" order at any time during performance of the contract.

- 4.1.7 On February 9, 2006 DOE Rule 10 CFR 851, "Worker Safety and Health Program," was published. This rule required that all existing DOE contractors submit a Worker Safety and Health Program (WSHP) to the Head of their DOE Field element by February 16, 2007. It further stipulated that beginning May 25, 2007 no work could be performed at a covered workplace unless an approved WSHP was in place for the workplace. DOE-SR developed an Integrated Project Team (IPT) to ensure effective implementation of this rule across the site. All existing SRS contractors that were subject to the rule had approved WSHPs in place by the deadline of May 25, 2007. All new contracts are required to obtain approval of their WSHPs before commencing work at SRS. The Office of Contracts Management (OCM) is responsible for notifying the Technical Support Division (TSD) of any new contracts so that a determination can be made as to whether or not 10 CFR 851 applies to each new contract.
- 4.1.8 For DOE-SR non-contractual arrangements utilized to authorize work on the SRS, a defined safety framework shall be included in the agreement. These formal agreements (e.g., interagency agreements, cooperative agreements, etc.) specify the commitment to safety by the organization being authorized to conduct work, the authority of DOE-SR to perform unannounced inspections of work being conducted, and DOE-SR's authority to issue a "Stop Work" order. Additionally, safe performance of work is the responsibility of the organization approved to perform work regardless if the work is performed directly or through others via subcontracts or other arrangements. DOE-SR non-contractual arrangements require an organization approved to perform work to flow down contract requirements, and in specific safety requirements to all subcontracts and other arrangements that perform work through others.

Example:

- A. **DOE-SR Interagency Agreement with the USDA Forest Service Southern Region (USFS-SR)** - the USFS-SR is required to have a safety framework that establishes safety programs that are compliant with Occupational Safety and Health Agency's requirements applicable to the work being performed. The USFS-SR is responsible for maintaining compliance to their safety framework. DOE-SR performs periodic inspections of USFS-SR work to verify compliance with the requirements of the interagency agreement. The interagency agreement states that the USFS-SR is responsible for the safe performance of all its work including work accomplished through others (e.g., subcontractors, vendors, etc.) and for the flow down of contract requirements to these arrangements. USFS-SR maintains DOE-SR's authority to perform unannounced inspections and to issue a "Stop Work" order for all of its arrangements to perform work.

- 4.1.9 Contractors and subcontractors, having short-term (typically one year or less) contracts which have distinct scopes of work (e.g., construction), will have contracts that clearly define safety expectations in a level of detail commensurate with the nature of the work and its associated hazards.
- 4.1.10 All long-term (typically multi-year) arrangements having a less distinct scope of work, which include contracts such as the Washington Savannah River Company (WSRC) management and operating (M&O) contract, the Wackenhut Services Incorporated (WSI) service contract, the USFS interagency agreement, the University of Georgia cooperative agreement to manage and operate the Savannah River Ecology Laboratory (SREL), as well as NNSA activities at SRS, are required to comply with DOE-SR policies for establishing safe work environments and conducting environmentally sound operations. This commitment is achieved and documented by the signatures of the managers of these organizations in SRP-05-03, "Savannah River Site Workplace Safety, Health, and Security Policy" and SRP-05-04, "Savannah River Site Environmental Management System Policy". The commitment to these policies is renewed on a yearly basis. Copies of the policies and the commitment signatures are posted in prominent areas across the site. The privatized activities of South Carolina Electric and Gas (maintenance of 115 kV lines), the Mixed Oxide Fuel Fabrication Facility (MFFF) and the Three Rivers Run Landfill are subject to oversight and enforcement of safety regulations directly by the federal Occupational Safety and Health Administration.

5.0 GUIDING PRINCIPLES

- 5.1 The seven guiding principles discussed below are the fundamental policies guiding DOE-SRS and contractor actions. DOE-SRS's implementation of each guiding principle is discussed in Section 6.0 of this Manual.
- 5.1.1 **Line Management Responsibility for Safety.** An effective integrated safety management system must ensure that line management is directly responsible for protection of the public, workers, and the environment.
- 5.1.2 **Clear Roles and Responsibilities.** An effective integrated safety management system must ensure that clear and unambiguous lines of authority and responsibility for safety are established and maintained at all organizational levels within the DOE and its contractors.
- 5.1.3 **Competence Commensurate with Responsibilities.** An effective integrated safety management system must ensure that personnel possess the experience, knowledge, skill and abilities necessary to discharge their responsibilities.
- 5.1.4 **Balanced Priorities.** An effective integrated safety management system requires that resources be appropriately allocated to address safety, programmatic, and operational considerations. Protecting the public, workers, and the environment shall be a priority when work activities are planned and performed.

- 5.1.5 **Identification of Safety Standards and Requirements.** An effective integrated safety management system requires that before work is performed, associated hazards are evaluated and safety standards and requirements are established. Safety standards and requirements (if properly implemented) ensure the public, workers, and environment are protected from adverse consequences.
- 5.1.6 **Hazard Controls Tailored to Work Being Performed.** An effective integrated safety management system requires that administrative and engineering controls designed to prevent and mitigate hazards be tailored to the work being performed and the associated hazards.
- 5.1.7 **Operations Authorization.** An effective integrated safety management system requires that the conditions and requirements that must be satisfied for operations are agreed upon in advance, are documented in writing, and are maintained up to date during performance of the work.

5.2 SUPPLEMENTAL SAFETY CULTURE ELEMENTS

The following four Supplemental Safety Culture Elements are used by DOE at the Savannah River Site, along with the Guiding Principles, to help develop the appropriate context or environment for effective implementation of the DOE-SRS ISM System. The site has established an excellent safety record by understanding the integral relationship between the integrated safety management system and human performance, and by relentlessly pursuing a high level of proficiency in both. DOE-SR and our contractors recognize that Human Performance Improvement is the natural evolution and next logical step in achieving an injury-free work environment and event free operations. To this end, DOE-SR is championing a Human Performance Improvement (HPI) initiative at the SRS. We are working in partnership with our prime contractors to implement the HPI initiative, and have tasked the Management and Operating (M&O) contractor with the lead role for this collaborative project. The overall objective of the initiative is to strive toward event-free performance through the proactive management of human error and the strengthening of defenses.

- 5.2.1 **Individual Attitude and Responsibility for Safety.** Every individual accepts responsibility for safe mission performance. Individuals demonstrate a questioning attitude by challenging assumptions, investigating anomalies, and considering potential adverse consequences of planned actions. All employees are mindful of work conditions that may impact safety, and assist each other in preventing unsafe acts or behaviors.
- 5.2.2 **Operational Excellence.** Organizations achieve sustained, high levels of operational performance, encompassing all DOE and contractor activities to meet mission, safety, productivity, quality, environmental, and other objectives. High reliability is achieved through a focus on operations, conservative decision-making, open communications, deference to expertise, and systematic approaches to eliminate or mitigate error-likely situations.

5.2.3 **Oversight for Performance Assurance.** Competent, robust, periodic and independent oversight is an essential source of feedback that verifies expectations are being met and identifies opportunities for improvement. Performance assurance activities verify whether standards and requirements are being met. Performance assurance through conscious, directed, independent reviews at all levels brings fresh insights and observations to be considered for safety and performance improvement.

5.2.4 **Organizational Learning for Performance Improvement.** The organization demonstrates excellence in performance monitoring, problem analysis, solution planning, and solution implementation. The organization encourages openness and trust, and cultivates a continuous learning environment.

5.3 CORE FUNCTIONS FOR INTEGRATED SAFETY MANAGEMENT

The five core safety management functions identified below provide the structure for integrating safety management with any work activity that could potentially affect the public, workers, or the environment. The functions are applied as a continuous cycle, with the degree of rigor appropriate to address the type of work activity and hazards involved. DOE-SRS's implementation of the core functions is discussed in detail in Section 6.0 of this Manual.

5.3.1 **Define Scope of Work.** Missions are translated into work, expectations are set, tasks are identified and prioritized, and resources are allocated.

5.3.2 **Analyze Hazards.** Hazards associated with work are identified, analyzed, and categorized.

5.3.3 **Develop and Implement Hazard Controls.** Applicable standards and requirements are identified and agreed upon, controls to prevent or mitigate hazards are identified, the safety envelope is established, and controls are implemented.

5.3.4 **Perform Work within Controls.** Readiness is confirmed and work is performed safely.

5.3.5 **Provide Feedback for Continuous Improvement.** Feedback information on the adequacy of controls is gathered, opportunities for improving the definition and planning of work are identified and implemented, line and independent oversight is conducted, and, if necessary, regulatory and enforcement actions occur.

5.4 INTEGRATED SAFETY MANAGEMENT MECHANISMS

Safety mechanisms define how the core safety management functions are implemented. At SRS, policies, procedures and manuals are the principal mechanisms for implementing the site ISMS. These mechanisms may be prepared and approved at the DOE-HQ level (DOE policies and orders); prepared by DOE-SR and approved by DOE-HQ (when authority is not delegated to the Field Office Manager); prepared and approved at the DOE-SR level (e.g., SRIPs, SRMs); prepared by the contractor and approved by DOE-SR (e.g., S/RIDs and DSAs); or prepared and approved at the contractor level. Mechanisms may vary from facility to facility and activity to activity, based on the associated hazards and the work being performed.

5.5 RESPONSIBILITIES FOR INTEGRATED SAFETY MANAGEMENT

Responsibility for safety must be clearly defined in documents that can be linked to specific work activities. An overview of DOE responsibilities for safety management is provided in DOE M 411.1-1C, "Safety Management Functions, Responsibilities, and Authorities Manual". These responsibilities are further defined and supplemented by DOE-HQ program office and operations office functions, responsibilities, and authorities documents. In addition, specific responsibilities flow down from Departmental directives to site-specific implementing directives. The primary SR document that establishes functions, responsibilities, and authorities is SRM 300.1.1B, Chapter 1, Section 1.1, "SR Functions, Responsibilities and Authorities Procedure." Contractor responsibilities are defined in contracts, regulations, and contractor-specific procedures.

5.6 IMPLEMENTATION OF INTEGRATED SAFETY MANAGEMENT

5.6.1 Implementation refers to development and application of ISMS mechanisms to specific work activities. At SRS, these mechanisms are primarily implemented through site-level programs. Using the WSRC M&O contract as an example, as shown in Figure 1, integrated safety management is implemented at SRS through an overarching and structured process for the conduct of work under that contract.

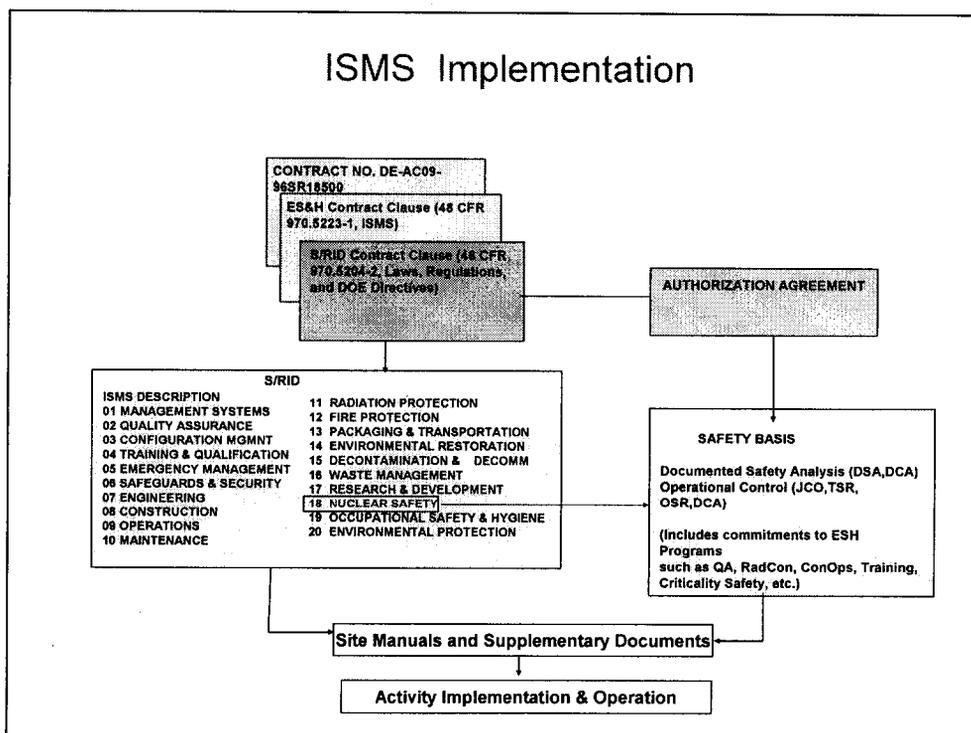


Figure 1. SRS WSRC Integrated Safety Management System Implementation

5.6.2 The WSRC ISMS description document specifically addresses the current WSRC management and operating (M&O) contract. A similar configuration is in place for the WSI security contract. DOE-SR also has the option to directly manage projects, such as the Salt Waste Processing Facility (SWPF) project. These projects are conducted following the DOE-HQ requirements for project management (see SRM 410.1.1D, "Project Management Manual").

As such, they provide their own functions, responsibilities, and authorities assignments, as well as, establish a graded approach implementing integrated safety management. These are captured in the PEP and through their contract which specifies the legal requirements to apply ISMS to the contract-related work. This provides the assigned Federal Project Manager greater flexibility to tailor the project's ISMS to accommodate changing needs as the project progresses through its execution phases. In either of these arrangements, the DOE-SR Manager approves the ISMS to be used.

The need to integrate ISMS requirements among multiple SRS activities approved by DOE-SRS is accomplished by providing in a contract or non-contract arrangement of concern, a clause requiring this integration. This requirement may be satisfied through establishment of interfacing agreements (e.g., Memorandums of Understanding and/or Memorandums of Agreement (MOU/MOA)). Tailoring, in accordance with the DOE directives and Department of Energy Acquisition Regulation (DEAR) clauses for establishing ISMS, will be applied to DOE-SR contracts.

NNSA's Office of Site Engineering/Construction Management (OSECM) at the Savannah River Site conducts project and program management, contractor oversight, assessments, and authorization and approval of the work products consistent with both the DOE-SR ISM Description Document and its own NNSA plans and procedures. The three major projects under OSECM's purview operate under Project Execution Plans that address the requirements of DOE Order 413.3. Clear roles and responsibilities are documented in Integrated Project Team charters and other required project documents. OSECM utilizes the SIMTAS system to formally document assessments, track findings to resolution, effectively document OSECM oversight of the contractors' activities, and maintain continuous improvement.

6.0 IMPLEMENTATION OF INTEGRATED SAFETY MANAGEMENT AT DOE-SRS

This section describes how integrated safety management is implemented at DOE-SRS for each of the seven guiding principles and five core functional areas.

6.1 DOE-SRS IMPLEMENTATION OF THE SEVEN GUIDING PRINCIPLES

6.1.1 Principle 1: Line Management Responsibility for Safety

- Primary DOE-SRS Procedural Mechanism:
 - SRM 300.1.1B, Chapter 1, Section 1.1, "SR Functions, Responsibilities and Authorities Procedure"

- SRM 226.1.1, "Integrated Performance Assurance Manual"

Discussion: At DOE-SRS, assignment of line management's responsibility for safety is accomplished via SRM 300.1.1B, Chapter 1, Section 1.1. Part 1 of this procedure addresses the safety management functions identified in DOE M 411.1-1C, EM FRA, program office functions, responsibilities, and authorities documents, other pertinent functions, responsibilities and authorities delegated to the DOE-SR Manager, and identifies which DOE-SR organization is responsible for each ISMS action. The processes for executing ISMS actions are delineated in DOE-SR implementing procedures (SRIPs, SRPs, SRMs), and other activity and program-specific documents. Part 1 of the SR FRAP also identifies the applicable process for the assigned ISMS action. Part 2 summarizes the assignment of applicable ISMS actions of Part 1 and groups them by responsible individual Assistant Managers and/or Office Directors. Specific examples of DOE-SRS line management's responsibility for safety include the approval of Safety Basis documents and line authority to stop work.

The DOE-SR Contractor Oversight System is designed to provide DOE-SR management sufficient information to make informed decisions regarding contractor and DOE-SR performance and whether program corrections are necessary. Additionally, the system will enable DOE-SR management to focus resources where improvements are needed most.

6.1.2 Principle 2: Clear Roles and Responsibilities

- Primary DOE-SRS Procedural Mechanism:
 - SRM 300.1.1B, Chapter 1, Section 1.1, "SR Functions, Responsibilities and Authorities Procedure"
 - SRM 300.1.1B, Chapter 2, Section 2.1, "SR Position Management and Classification Process"
 - SRM 300.1.1B, Chapter 5, Section 5.2, "SR Performance Management Process"
 - Memorandum, RA-07-032, Arkin to Allison, "SRSO Adoption of Department of Energy Savannah River Operations Office Manuals, Procedures, and Policies", dated 10-05-06 (as amended)
 - SV-MOA-001, "Agreement of Safety Management at Savannah River Site", dated 4-20-07 (as amended)
 - Memorandum of Agreement, "Safety Management at the Savannah River Site" between NNSA Fissile Materials Disposition Office and DOE-SR, dated 10-14-05
 - Memorandum of Agreement, "Fissile Materials Disposition Activities at the Savannah River Site", between the Assistant Deputy Administrator for Fissile Materials Disposition (NA-26) and the Manager, SRSO, dated 10-02-06

Discussion: At DOE-SR, Parts 1 and 2 of the SRM 300.1.1B, Chapter 1, Section 1.1, "SR Functions, Responsibilities and Authorities Procedure", establish clear roles, responsibilities, and delegations of authority for each Assistant Manager and/or Office Director, down to the division level. Specific roles and responsibilities are further clarified as appropriate in SRIPs and SRMs, which may specify roles, responsibilities, and levels of authority for specific work activities and functions.

The Position Management and Classification Process procedure (SRM 300.1.1B, Chapter 2, Section 2.1,) establishes the review and validation steps required for assuring that clear roles and responsibilities for safety are identified in position descriptions and are aligned with the organizational mission and functions in the SR FRAP. Supervisors utilize this process to ensure position descriptions (PDs) are properly developed for identifying and assigning safety management responsibilities to employees. The process requires that employees acknowledge that their assigned PD is correct and that they are responsible for and will be evaluated on the successful accomplishment of the actions assigned to them.

Using the Performance Management Process procedure (SRM 300.1.1B, Chapter 5, Section 5.2), supervisors establish performance and development expectations for employees accomplishing assigned responsibilities. The procedure specifies the minimum supervisor/employee interface periods (mid-year and annually) to provide performance evaluation feedback and identify opportunities for improvement based on the employees' success in accomplishing work activities. This process ensures an ongoing confirmation that clear roles and responsibilities are maintained.

The safety roles and responsibilities between DOE-SR and NNSA entities on site are clearly delineated in the MOU mentioned above. In many cases, NNSA has elected to adopt DOE-SR manuals, procedures, and policies rather than developing separate guidance documents. As necessary, NNSA develops additional procedures and processes in order to effectively implement Departmental policy on ISMS.

6.1.3 Principle 3: Competence Commensurate with Responsibilities

- Primary DOE-SRS Procedural Mechanisms:
 - SRM 300.1.1B, Chapter 1, Section 1.2, "DOE-SRS Organizational Configuration Control Process"
 - SRM 300.1.1B, Chapter 3, Section 3.1, "DOE-SR Merit Promotion and Placement Process"
 - SRM 300.1.1B, Chapter 5, Section 5.2, "DOE-SR Performance Management Process Procedure"
 - SRM 300.1.1B, Chapter 6, Section 6.1, "DOE-SR Technical Qualification Program and Acquisition Career Development Program Process Procedure"
 - SRM 300.1.1B, Chapter 6, Section 6.2, "DOE-SR Training and Continuing Education Processes"

Discussion: The DOE-SR manual (SRM 300.1.1B) is a collection of procedures that describe the processes for implementing the Human Capital Management System functions. These procedures, discussed in the paragraphs below, identify the assignment of functions and responsibilities; requirements for controlling organizational changes; designing the workforce structure; identifying competencies; identifying critical skill positions; developing positions and personnel; and, staffing positions that are responsible for executing assigned or delegated ISMS functions with competent personnel. These human resource management processes for establishing, evaluating, and continuing the improvements of employee competencies for accomplishing their assigned tasks ensure the safe accomplishment of the DOE-SRS mission.

The DOE-SR Performance Management Process procedure (SRM 300.1.1B, Chapter 5, Section 5.2) requires each employee to meet with his/her supervisor to develop an annual Individual Training Plan (ITP) containing qualification activities tailored to their specific job duties. The requirement for an annual ITP applies to all employees to ensure that employee competence is not only maintained, but continually enhanced.

Based on work assignments, DOE-SR employees may also participate in the DOE-SR Technical Qualification Program (TQP).

The DOE-SR Merit Promotion and Placement Process procedure (SRM 300.1.1B, Chapter 3, Section 3.1) ensures the systematic and consistent selection of qualified candidates for promotion and placement into line management positions which could impact DOE-SR's ability to safely oversee the operations of the Site. The results of this process validate that line management has staffed positions with competent and qualified employees with the necessary knowledge, skills and attitudes to execute organizational ISMS functions.

The DOE-SR Position Management and Classification Process procedure (SRM 300.1.1B, Chapter 2, Section 2.1) ensures that competencies required for the position align with the organizational responsibilities of the organization. DOE-SR utilizes this systematic approach to determining the number of positions needed; the skills, knowledge, and competencies required to successfully perform the safety functions and duties of the positions; and the grouping and assignment of duties and responsibilities to achieve maximum efficiency and economy in the workforce.

DOE-SR has established an ETMB, further discussed in Section 6.2.6. The ETMB is primarily responsible for guiding DOE-SR plans and actions in the areas of improvement and maintenance of the technical capability of the Federal workforce and the site's Performance assurance and Facility Representative (FR) Programs. The ETMB leads the development and implementation of strategies and action plans involving the preservation and improvement of DOE-SR capabilities.

The ETMB provides necessary line organizations support for qualification/re-qualification activities as well as review for endorsement of functional qualification standards for new TQ positions and new senior technical safety management positions.

The Facility Representative Council (FRC) oversees the FR Qualification Program at DOE-SRS. An approved charter governs the operations and activities of this Council.

The DOE-SR TQP, also monitored by the ETMB, is a rigorous qualification program specifically designed to ensure technical competency commensurate with job responsibility. Every DOE-SR senior manager with responsibilities that may impact nuclear facility safety must qualify as a Senior Technical Safety Manager (STSM) under this program. In addition, DOE-SR currently has employees participating in the TQP. They maintain qualification in functional areas such as nuclear safety systems, safety system oversight (site specific), mechanical systems, fire protection, environmental compliance, chemical processing, facility maintenance management, waste management, radiation protection, and safeguards and security.

DOE-SR's representative to the Federal Technical Capability (FTC) Panel, the FTC Agent, is responsible for the oversight, evaluation, and direction of the DOE-SR TQP. The FTC Agent solicits information and feedback from line management regarding the improvement of technical capability of the DOE-SR workforce. The FTC Agent seeks support from senior management regarding the successful implementation of the FTC program at DOE-SR and monitors other safety management activities. The FTC Agent participates in the recruitment and selection of STSMs and is actively involved in the oversight function for submittal of STSM status reports to DOE-HQ. The FTC Agent oversees implementation of the DOE-SR TQP and participates in and oversees TQP assessments.

The DOE-SR 5-Year Workforce Management Plan identifies the resources and capabilities required for continued operations and accelerated cleanup. It identifies the critical technical skill positions required to address safety, programmatic, and operational considerations. DOE-SR has implemented a "defense-in-depth" strategy to assure that more than the minimum required personnel are qualified at all times to ensure no disruptions of safe operations. When skill shortfalls supporting these areas are identified, the Plan identifies the process for staffing these critical positions.

Additionally, during periods of change, such as realignments or re-organizations, the DOE-SRS Organizational Configuration Control Process procedure (SRM 300.1.1B, Chapter 1, Section 1.2) provides for effective organizational changes and mitigates breakdowns in the assignment of safety related work necessary to accomplish the mission. This process ensures effective transition of accountability for safety related functions if organizational changes are required.

6.1.4 Principle 4: Balanced Priorities

- Primary DOE-SRS Procedural Mechanisms:
 - DOE O 430.1B, "Real Property Asset Management"
 - DOE P 430.1, "Land and Facility Use Planning"
 - SRM 130.2.1A, "Management Plan for Planning, Budgeting, Work Authorization and Control"
 - SRP 06-02, "DOE-SR Safety Integration of Early Design Phases"

Discussion: Protecting the workers, the public, and the environment is a top priority whenever the DOE plans and performs work. Critical to achieving this priority is providing adequate resources and ensuring that those resources are effectively allocated. DOE-HQ and DOE field elements establish a method for ensuring a proper balance among competing priorities (e.g., budget, schedule, safety, and quality).

The Office of Environmental Management (EM) Closure Planning Guidance (issued June 1, 2004), is a document that turns initiatives from the "top-to-bottom review" into formal processes that can predictably deliver results and safely complete cleanup of the EM program by 2035. This document serves as a guide for a 5-year period and will provide consistency as well as linkage among the "top-to-bottom review", the Integrated Planning, Accountability, and Budget System-Information System and EM's reports to congress, as well as the DOE-HQ Strategic Plan.

Planning is a key component in ensuring that SRS has a system in place to effectively balance mission priorities. The DOE-HQ Strategic Plan reflects a restructured environmental cleanup program developed from an intensive "top-to-bottom review" that emphasized the need to reduce risk rather than manage it. The aggressive new cleanup strategy emphasizes doing more real work, greater accountability, increased competition, and innovative cleanup methods. Using the DOE-HQ Strategic Plan as a foundation, DOE-SR's planning process employs a systematic and integrated approach to ensure that all work scope is identified to support the various site missions. The products of this planning are the DOE-EM Ten-Year Site Plan, the DOE-SR EM PMP, and the contracts that execute actions of the PMP.

Sitewide integrated planning complies with DOE O 430.1B, "Real Property Asset Management" and DOE P 430.1, "Land and Facility Use Planning". DOE O 430.1B requires the development of a DOE-SR Ten-Year Site Plan for non-closure sites. This plan is a comprehensive sitewide plan that addresses all requirements to support the Department's strategic plan, programmatic and/or detailed organization mission plans, and other planning and programmatic guidance. It also identifies associated safeguards and security plans. Programmatic and/or detailed organization mission plans are also developed, linking strategic planning elements and objectives to more specific scopes of work.

Contract Modification No. M161 has defined work scope for the M&O contract through the end of the contract period (June 2008). DOE-SR monitors contractor performance through implementation of the Performance Evaluation and Measurement Plan and Contract Management/Oversight Plan. The environmental management work scope was defined and agreed to through development of the Contract Performance Baseline. The Manager, DOE-SR, has designated and chartered a Baseline Configuration Control Board to ensure the proper definition, coordination, evaluation, and disposition of proposed changes to the SRS Contract Performance Baseline and EM program elements under configuration control of the DOE-HQ EM Configuration Control Board. The Baseline Configuration Control Board also reviews proposals to reallocate funds. The objective is to ensure each change document, Baseline Change Proposal or Request for Equitable Adjustment, submitted by the contractor is reviewed and evaluated using appropriate criteria and approved at the appropriate level of management.

6.1.5 Principle 5: Identification of Safety Standards and Requirements

- Primary DOE-SRS Procedural Mechanisms:
 - SRIP 251.2, "Oversight of Contractor S/RID Activities"
 - SRIP 253.1, "Preparation and Approval of DOE-SRS Directives"
 - WSRC-RP-94-1268 (the SRS S/RID)
 - 48 CFR 970.5204-2, "Laws, Regulations and DOE Directives"

Discussion: At SRS, the Standards/Requirements Identification Document (S/RID) contains the environmental, safety, and health standards and requirements applicable to all work conducted by the site's M&O contractor. The S/RID was initially approved in August 1995, but the development and approval process took full advantage of the order compliance process ongoing at SRS since 1990. S/RID development started with a conservative set of requirements initially focused on DOE Orders of interest to the DNFSB and was later expanded to include other state and Federal regulations and standards, and additional requirements as appropriate. The original S/RID was developed and reviewed by the contractor's subject matter experts, regulatory compliance staff, functional area managers, and line management at the highest levels and submitted to DOE-SR. After a thorough review by program and line management organizations and resolution of comments, the S/RID was approved by the Manager, DOE-SR.

New requirements or directives are identified by DOE-SR and transmitted to the M&O contractor for incorporation in the S/RID. All S/RID changes are reviewed and approved by DOE-SR. This review and approval process is subject to formal change control requirements. The S/RID is a living document and is invoked by the contract. The contractor is expected to maintain, revise, and update the S/RID as appropriate to reflect changes to source documents, changes in site missions, and changes resulting from operating experience, lessons-learned, and site re-engineering initiatives. S/RID requirements are sorted into 20 functional areas and assigned to applicable facility categories. The mechanics of the S/RID and its organization is provided in WSRC-RP-1268-000, Functional Area 00, "S/RID Purpose and Scope". This same process applies to the site security contract. Other non-M&O contracts that are less complex in nature or limited in scope may invoke standard Federal Acquisition Regulations and Department of Energy Acquisition Regulations safety contract clauses and requirements of 48 CFR directly from the contract without the use of an S/RID process.

The S/RID identifies requirements and standards applicable to the design, construction, operation, and decommissioning of defense nuclear and non-nuclear facilities. In November 1998, the requirements of DOE P 450.4, "Safety Management System", were incorporated into the S/RID, Functional Area 00, "S/RID Purpose and Scope" (WSRC-RP-94-1268-000). In 2007, the requirements of DOE M 450.4-1, DOE Integrated Safety Management System Manual," were incorporated into the S/RID. Each S/RID requirement is incorporated into applicable contractor management control documents such as policies and procedures, specifying the specific actions and conditions necessary to ensure compliance (see Figure 2 next page). Assessments are performed by DOE-SR (as part of its oversight and assessment programs) and include evaluations of the processes for flowing down requirements from source documents through the S/RIDs, to company-level and implementing procedures. Contractors, as part of their assurance system process, may utilize internal independent or self-assessments to determine whether procedures specify the actions and conditions necessary to ensure compliance.

WSRC compliance assessment results are provided electronically as updates to S/RID Tables 2 and 3 (see Figure 3 below) and are available on ShRINE.

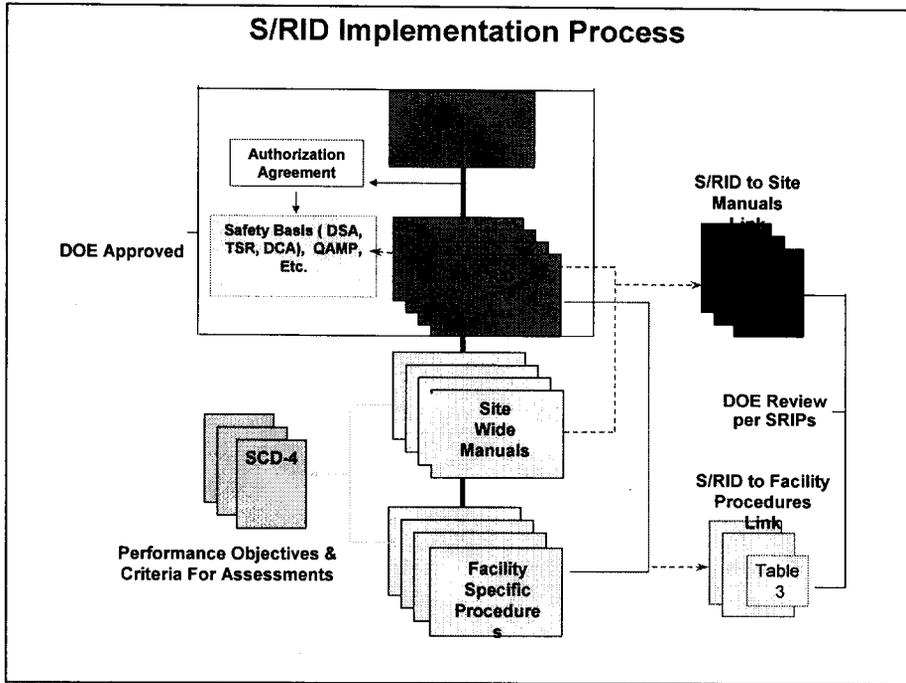


Figure 2 - S/RID Process

S/RIDs - Table 1

WESTINGHOUSE SAVANNAH RIVER COMPANY		Report:																		
STANDARD REQUIREMENTS DERIVATION DOCUMENT		WSRC-OP-04-1204-010																		
		FUNCTIONAL AREA:																		
		REVISION: 01-12																		
		NUCLEAR SAFETY																		
		Table 1, Page 20																		
		Date:																		
		12/07																		
TABLE 1: SRID FUNCTIONAL AREA 11 (NUCLEAR SAFETY) REQUIREMENTS																				
SRID Requirement Number	Event Description	Source Document Requirement Number	Requirement Text	SRID Applicability						Phase 1 Compliance Approach										
				Header and Subheader	Header	Support	Site Subject	Other	Facility Specific		General	Facility Specific	Common	Facility Specific						
18.09.001	AMS 8.10	7.7	Directions have operating procedures and instructions identified in process and direct and other nuclear safety, shall be documented, reported to management, and investigated promptly. Action shall be taken to prevent recurrence.																	X
18.09.002	AMS 8.10	8.2	The nuclear safety, safety protection and assurance and explicitly identify the compliance parameters and their associated measurement which nuclear safety safety devices.																	X
TABLE 2: SRID FUNCTIONAL AREA 11 (NUCLEAR SAFETY) REQUIREMENTS: P-Component																				
SRID Number	Implementing WSRC Management Controls					Phase 1 Programmatic Compliance	Phase 2 Administrative Compliance	Compliance Date	Compliance Status	Comments (Refer to Requested for Approval (RFA))										
	Document Reference	Category	Level	Item	Control															
18.09.001	28	1.3	2	None Necessary	Compliance	18.09.01.01	Y													
AMS 8.10	28	1.1	1																	
TABLE 3: SRID FUNCTIONAL AREA 11 (NUCLEAR SAFETY) REQUIREMENTS: P-Component																				
SRID Number	Implementing WSRC Management Controls					Phase 1 Programmatic Compliance	Phase 2 Administrative Compliance	Compliance Date	Compliance Status	Comments (Refer to Requested for Approval (RFA))										
	Document Reference	Category	Level	Item	Control															
18.09.001	See Table 2	MS	A-11	8.11	Compliance	18.09.01.01	Y													
AMS 8.10																				

Figure 3 - S/RID Tables 1, 2 and 3

These tables can be found on ShRINE at http://bnet4.srs.gov/rss/index.asp?module=srid_home

The order compliance process, precursor to development of the S/RID, remains in place for DOE-SRS personnel (described in SRIP 253.1, "Preparation and Approval of DOE-SRS Directives"). Compliance with DOE Orders of interest to the DNFSB that are applicable to the performance of work by DOE-SR personnel is documented in Order Compliance Assessment Matrices. In some cases, DOE-SR personnel are required by policy to comply with established contractor procedures, such as those for occupational safety and radiological protection. In most cases, however, DOE-SR policies and manuals provide detailed site-specific implementing requirements for DOE-SR personnel (see Figure 4 below). Implementing procedures and policies for both DOE and contractor are readily available electronically through the Savannah River Information Network Environment (ShRINE).

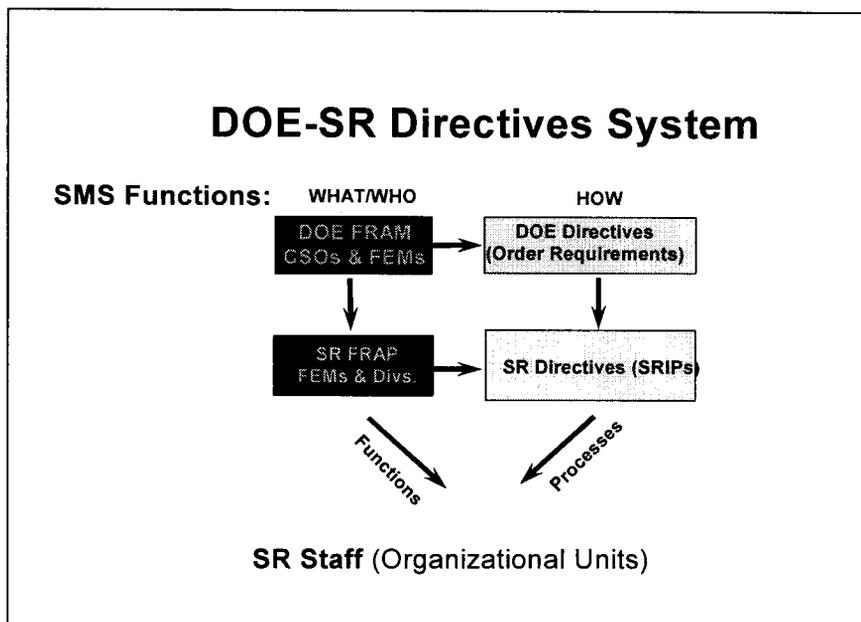


Figure 4 - DOE-SR Directives System

6.1.6 Principle 6: Hazard Controls Tailored to Work Being Performed

- Primary DOE-SRS Procedural Mechanisms:
 - SRIP 421.1, "Nuclear Safety Oversight"
 - SRIP 450.4, "Authorization Agreements"

Discussion: DOE-SRS's graded approach ensures that as hazards increase, increasing controls are put in place to prevent and mitigate activity-specific hazards. For example, SRS facilities are categorized by hazard: high-hazard facilities must have a comprehensive Documented Safety Analysis (DSA), less hazardous facilities utilize a less comprehensive DSA, and low-hazard facilities require only an Auditable Safety Analysis. In addition, depending on the hazards associated with a particular job, an extensive Process Hazards Review, or a less extensive Job Hazards Analysis, may be utilized.

Responsibility for hazard analysis and development and approval of operational controls derived from hazard analyses of non-nuclear facilities rests with the operating contractor, with periodic oversight by DOE-SRS personnel. For high-hazard nuclear facilities, DOE-SR utilizes formal Authorization Agreements (AA) (per SRIP 450.4), incorporating the results of DOE-SR reviews of the contractor's proposed safety basis for a defined scope of work. AAs are developed in conjunction with startup (or restart) approval by DOE-HQ, approval of safety basis documents by DOE-HQ, or any other direction provided to the contractor that alters the scope of operations, special terms, or conditions specified by DOE-HQ.

6.1.7 Principle 7: Operations Authorization

- Primary DOE-SRS Procedural Mechanisms:
 - SRIP 450.4, "Authorization Agreements"
 - SRIP 425.1, "Nuclear Facility Startup Approval Process"

Discussion: The contract between DOE-SR and its contractors constitutes the basic agreement by which all work is performed. S/RID requirements (discussed in Section 6.1.5) define the process for analyzing hazards and developing hazard controls. For the majority of activities conducted at SRS, the base M&O contract and contract modification number M161, as supplemented by the contractor's WA/EP, Contract Performance Baseline, and S/RID requirements, serves to authorize operations. However, for some high-hazard activities, such as Hazard Categories 1 and 2 nuclear facilities, DOE recognized the need for an additional specific document authorizing operations. AAs (described in SRIP 450.4) are documented agreements between DOE-SR and its contractor for high-hazard facilities. The AA contains key terms and conditions where the contractor is authorized to perform work and incorporates DOE-SR's review of the contractor's proposed safety basis for a defined scope of work. "Safety Basis" includes aspects of facility design and operational requirements relied upon by DOE to authorize operation, and which are described in documents such as facility DSAs, hazard classification documents, Technical Safety Requirements, and DOE-issued Safety Evaluation Reports (SERs). DOE recognized that depending upon the governing document, there may be differences in the scope of work or range of operations. For example, DOE may have issued a Record of Decision affecting scope of operational activities in a facility that may differ from the scope of operational activities defined in the current Contract Performance Baseline, and may differ from the scope of operational activities that was analyzed by the DSA. The AA reconciles any differences into a single integrated set of conditions and requirements for operation. Although specifically designed for Hazard Categories 1 and 2 facilities, DOE-SR may elect to utilize AAs in special situations for lower hazard activities if their use is warranted due to the complexity of the work and control required.

The DOE-SR process for development, review, and approval of AAs and Nuclear Facility Startup Approval Process are defined in SRIP 450.4 and SRIP 425.1, respectively.

6.1.8 Safety Culture Principle 8: Individual Attitude and Responsibility for Safety

- Primary DOE-SRS Procedural Mechanisms:
 - SRP 05-03, "SRS Workplace Safety, Health, and Security Policy"
 - SRP 05-04, "SRS Environmental Management System Policy"
 - SRM 300.1.1B, Chapter 1, Section 1.1, "SR Functions, Responsibilities and Authorities Procedure"
 - DOE-SR Employee Performance and Development Plans (P&DPs)
 - DOE-SR Employee Position Descriptions

Discussion: All DOE-SRS employees understand their role in ensuring that work is performed in a safe manner. The SR Functions, Responsibilities and Authorities Procedure (SRM 300.1.1B, Chapter 1, Section 1.1) clearly delineates roles and responsibilities in regard to accomplishing the mission safely. Within this document, safety roles and responsibilities are specifically addressed. SRP 05-03, "SRS Workplace Safety, Health and Security Policy" institutes individual employee rights and responsibilities in regard to the site safety and health program. For FY 2007, every employee Performance and Development Plan (P&DP) includes Element 2 (Enhancing the Workplace Environment), which contains the following language in regard to safety:

Factors to be Evaluated, as applicable for all employees: Reports potential safety violations or unhealthy working conditions to management or appropriate safety official in a timely manner; such reports may be anonymous; supports departmental safety and health objectives; focuses on security of the workplace and the work environment;

Additional Factors for Supervisors and Team Leaders: Supports line managers in conducting health, safety, and security (HSS) responsibilities, as applicable, to ensure a safe and healthy environment for DOE Federal and contractual workforces.

Element 2 may not be critical for all employees in FY 2007, but for FY 2008, a critical safety element will be added to specifically address safety. This element will apply to all employees.

For FY 2007, each Senior Executive Service employee signed a stand-alone safety element that carries a weight of 15 out of a total of 60 for programmatic expectations. It is expected that this will continue for FY 2008.

The following generic "Site-Specific" competency is included in all employee/supervisor Position Descriptions (PDs):

Knowledge of the principles and concepts of the Integrated Safety Management System (ISMS) as they relate to the discharging of organizational responsibilities delineated in the DOE-SR Functions, Responsibilities, and Authorities Procedure (FRAP).

6.1.9 Safety Culture Principle 9: Operational Excellence

- Primary DOE-SRS Procedural Mechanisms:
 - SRM 300.1.1B, Chapter 1, section 1.1, "SR Functions, Responsibilities and Authorities Procedure" (FRAP)
 - SRIP 430.1, "DOE-SR Facility Representative Program"
 - SRM 414.1.1C, "Quality Assurance Program Manual"
 - SRM 410.1.1D, "Project Management Manual"
 - SRM 226.1.1, "Integrated Performance Assurance Manual"

Discussion: DOE-SR is committed to conducting work at SRS safely, securely, and efficiently, consistent with DOE environmental management and national security missions and objectives. To meet this commitment, DOE-SR has established a management system that relies on integrated processes for work planning, budgeting, execution, and change control for DOE-SR and its contractor organizations. It is implemented through the integration and execution of formal procedures and programs that include the involvement of workers throughout the organization. Of key importance in this system is the establishment of clear roles and responsibilities, and authorities for employees and organizations. The FRAP is the DOE-SR document that establishes key responsibilities for ensuring that SRS operations are safe and effective.

The DOE-SR Project Management Manual (SRM 400.1.1D) describes the initiation and implementation of a program/project from pre-conceptual through turnover for operation or surveillance. DOE-SR projects are managed using an integrated and systematic tailored approach based on project risk, complexity and cost. This tailored approach allows flexibility in the level and application of project controls, while providing effective program management at the lowest cost. The DOE-SR Federal Project Director (FPD) is responsible for ensuring successful project planning, execution and completion.

The DOE-SR Quality Assurance Program Manual (QAMP) describes the overall DOE-SR Quality Assurance Program (QAP) established to assign responsibilities and authorities, define policies and requirements, and provide for the effective performance and assessment of work. The DOE-SR QAP is a management system that ensures DOE-SR's mission, policies, and objectives are integrated into standard business practices and work processes. Functions and activities performed to satisfy or implement DOE-SR's mission, policies and objectives are based on the requirements of various source documents (e.g., DOE Orders, Federal Regulations, commercial standards). The commercial consensus standard upon which the DOE-SR QAP is primarily based is the American Society of Mechanical Engineers (ASME) NQA-1-2000, "Quality Assurance Requirements for Nuclear Facility Applications." The requirements of this standard are tailored using a graded approach to meet the needs of an organization whose primary functions involve contractor oversight. The goal of the QAP is to achieve continuous improvement while satisfying the appropriate requirements in a cost-effective manner.

To achieve that goal, a culture that encourages all employees to establish and maintain high standards, identify and resolve problems, accept recommendations for improvement, and foster mutual respect and effective communication has to be established and maintained. Employees are responsible for continuous pursuit of enhancements to safety and quality – not just complying with a minimal set of requirements.

The flow down to contractors of quality requirements, as well as other environment, safety and health requirements, is performed using a process that generates a Standards/Requirements Identification Document (S/RID). An S/RID is considered a part of the official contract between DOE-SR and a contractor and is approved by DOE. The S/RID process is defined and controlled by the requirements in SRIP 251.2, "Oversight of Contractor S/RID Activities." Validation and verification of contractor compliance with an S/RID is accomplished primarily through independent assessments, oversight of contractor self-assessments, and the facility representative oversight process.

The DOE-SR Executive Technical Management Board (ETMB) ensures that senior management attention is focused on assuring that the DOE-SR culture of safety, security, competence, and technical excellence are effectively maintained. The ETMB meetings provide the forum to ensure continued improvement in maintaining a technically qualified federal workforce, sustaining a comprehensive contractor oversight program, guiding project management and monitoring implementation of the Integrated Safety Management System (including Authorization Bases).

The Integrated Performance Assurance Manual (IPAM) and SRIP 430.1, "DOE-SR Facility Representative Program" both provide the framework that DOE-SR utilizes to determine if operations are being performed effectively and in accordance with all applicable rules and requirements.

6.1.10 Safety Culture Principle 10: Oversight for Performance Assurance

- Primary DOE-SRS Procedural Mechanisms:
 - SRM 226.1.1, "Integrated Performance Assurance Manual"

Discussion: To fulfill its responsibilities under DOE O 226.1, "Implementation of Department of Energy Oversight Policy," DOE-SR has established SRM 226.1.1A, "Integrated Performance Assurance Manual (IPAM)" to facilitate the administration of a standardized oversight process for Contractor Assurance Systems across the SRS. The IPAM describes processes that comprise the Contractor Oversight System, including (1) clearly communicating DOE requirements and expectations to contractors, (2) assessing the quality, effectiveness, and efficiency of contractor assurance systems and resulting work products in complying with contract requirements, (3) effecting continuous improvement in contractors' operations, and (4) enhancing the effectiveness of DOE-SRS oversight of contractor performance. The DOE-SRS Contractor Oversight System is designed to promote the integration of assurance system elements across all SRS contractor operations by evaluating and reporting on the site-wide implementation of performance assurance processes.

The IPAM also describes how DOE-SR evaluates the effectiveness of the DOE-SR Contractor Oversight System through self-assessments, independent internal assessments and performance measures.

The DOE-SR Contractor Oversight System is founded on an integrated cycle of feedback and continuous improvement common in other DOE-SR management systems. DOE-SR will:

- Systematically communicate requirements and expectations;
- Plan and conduct assessments of each contractor's performance assurance systems;
- Report the results, identify and track deficiencies, good practices and observations;
- Ensure correction of deficiencies;
- Analyze trends and performance measures;
- Forward performance information through the Performance Assurance Council (PAC) to the Executive Technical Management Board (ETMB);
- Hold each contractor accountable for the quality and productivity of performance;
- Integrate performance objectives in the Organizational Performance Management Plan (OPMP) with employee performance.

The DOE-SR Contractor Oversight System described in the IPAM is designed to provide DOE-SR Management sufficient information to make informed decisions regarding contractor and DOE-SR performance and whether program corrections are necessary. Additionally, the system will enable DOE-SR Management to focus resources where improvements are needed most.

The Site Integrated Management Total Assessment System (SIMTAS) is a database system used by DOE-SR to document the results of assessment activities conducted at the SRS. SIMTAS flexibilities allow oversight information inputs from a variety of sources, including onsite and offsite assessment activities, tracking and trending of oversight information, and the collection of corrective actions for identified deficiencies. SIMTAS also serves as an archive for historical assessment results.

6.1.11 Safety Culture Principle 11: Organizational Learning for Performance Improvement

- Primary DOE-SRS Procedural Mechanisms:
 - SRM 226.1.1, "Integrated Performance Assurance Manual"
 - SRIP 430.1, "DOE-SR Facility Representative Program"
 - SRM 414.1.1C, "Quality Assurance Program Manual"

Discussion: As mentioned in section 6.2.5, DOE federal and contractor organizations must share operating experience lessons learned with the DOE Complex through the DOE Corporate Lessons Learned database. The contractor's Lessons Learned Program sorts and screens lessons learned pertaining to the operation of facilities at SRS, as well as other sites in the DOE complex and commercial nuclear and industrial facilities. The contractor's Lessons Learned Program prepares and distributes lessons learned documents to all site organizations for information and use as appropriate. The Lessons Learned Program is included as an area for review by DOE-SRS when conducting oversight activities. DOE-SRS line and program offices continually look for ways to improve contractor and DOE activities as part of the daily conduct of business. DOE-SRS personnel observe and participate in contractor critiques. Type 1, Type 2, and other assessments of contractor activities reveal findings that are captured and fully documented in an assessment report. Assessment results are provided to the contractor. Close-out briefings for assessments facilitate the sharing of information across organizational lines, and help prevent stove-piping of information that may be used to improve site performance.

DOE and federal contractors must ensure timely collection, reporting, analysis, and dissemination of information on environment, safety, and health issues with the DOE Complex through the DOE Occurrence Reporting and Processing System (ORPS), as required by DOE O 231.1A, *Environment, Safety, and Health Reporting*. The contractor's ORPS program has developed a Performance Analysis Process as a means to ensure that recurring problems, issues, or events are identified and corrected, and thereby, preventing more serious or significant occurrences. The contractor's process is used to determine if commonalities exist within, and among, the previously identified problems and/or events. Any such commonalities are used to identify recurring problems, if any, such that effective corrective actions can be implemented to prevent recurrence. The contractor, as contractually required, provides DOE a Quarterly Performance Analysis. The DOE-SRS program and line offices continually work towards improving the number of occurrences (reportable & non-reportable) by reviewing site-wide events and determining if commonalities exist within, and among, any previously identified problems and/or events. DOE-SRS personnel work together to ensure that appropriate corrective actions are implemented. DOE-SRS personnel observe and participate in contractor critiques. Type 1, Type 2, and other assessments of contractor activities reveal findings that are captured and fully documented in an assessment report. Assessment results are provided to the contractor. Closeout briefings for assessments facilitate the sharing of information across organizational lines.

6.2 DOE-SRS IMPLEMENTATION OF THE FIVE CORE FUNCTIONS

6.2.1 Core Function 1: Define Scope of Work

- Primary DOE-SRS Procedural Mechanisms:
 - DOE O 430.1B, "Real Property Asset Management"
 - DOE P 430.1, "Land and Facility Use Planning"

- SRM 130.2.1, "Management Plan for Planning, Budgeting, Work Authorization and Control"
- SRM 410.1.1D, "Project Management Manual"

Discussion: SRM 130.2.1, "Management Plan for Planning, Budgeting, Work Authorization and Control", describes DOE-SRS's process for defining the scope of work, translating mission needs into work, setting expectations, prioritizing tasks, allocating resources, authorizing and controlling work, and reporting results. Strategic planning is the first step in defining work scope. DOE-HQ maintains a Strategic Plan establishing goals and direction for each DOE business line and focus area. Utilizing the DOE-HQ Strategic Plan (see Section 6.1.4 for a detailed discussion of the "top-to-bottom review", the EM Closure Planning Guidance, the DOE-HQ Strategic Plan, and the DOE-SR PMP), DOE-SRS translates strategic objectives and elements into site-level, programmatic, and/or detailed organization mission plans through the defined planning process. Plans such as the SRS EM Program Performance Management Plan, the SRS EM Integrated Deactivation and Decommissioning Plan, the Risk Based End State Plan, and the Comprehensive Cleanup Plan are a few examples of plans developed in support of strategic objectives.

- DOE-SRS uses the Contract Performance Baseline, supplemented by the WA/EP, to translate objectives of the strategic plans into definable work scope and provide strategic and outyear planning guidance to the M&O contractor. For effective planning, WA/EP and Contract Performance Baseline development and updates are aligned with the budget formulation and execution cycle.
- The WA/EP and the Contract Performance Baseline serves as execution documents for each fiscal year's work at SRS. Both documents define work scope, schedules (milestones), performance measures, and resources (estimated manpower and costs) for the fiscal year. These documents also serve as a collection point for all fiscal year performance measures and milestones from higher-tier and program-specific planning documents.
- For non-M&O type contracts, which are less complex in nature, the work scope is specifically defined by DOE-SRS in the basic contract or task orders issued under the contract.
- The Management Plan for Planning, Budgeting, Work Authorization and Control (SRM 130.2.1) also defines the formal process for changing work scope. The purpose of change control is to ensure that baseline changes exceeding defined thresholds are approved by appropriate management officials prior to initiation of work. The change control process also ensures that baselines are not changed unless associated with a change to scope (i.e., milestone due dates and estimated costs cannot be changed unless driven by a DOE-directed scope change).

6.2.2 Core Function 2: Analysis of Hazards

- Primary DOE-SRS Procedural Mechanisms:
 - SRIP 421.1, "Nuclear Safety Oversight"
 - SRIP 251.2, "Oversight of Contractor S/RID Activities"
 - SRP 06-02, "DOE-SR Safety Integration of Early Design Phases"

Discussion: SRIP 421.1, "Nuclear Safety Oversight", establishes requirements for DOE-SRS oversight of contractor nuclear safety programs and related activities, including hazard analyses. This procedure documents that DOE-SRS uses S/RIDs to establish the level of hazard analysis and documentation required for all site activities. Except for nuclear facilities, responsibility for development and approval of auditable hazard analyses rests with the site M&O contractor.

Safety Analysis is a documented process that includes systematic identification and assessment of hazards posed by a nuclear facility or operation. The safety basis must be considered and planned early in the design process for new or modified facilities. For nuclear facilities, DOE-SRS personnel review facility safety documentation, including hazards analyses, facility classifications, unreviewed safety questions (USQs), and structures, systems, and components classifications. DOE-SRS issues SERs documenting review of contractor safety documentation and the basis for approval of the safety basis documents. DOE-SRS line organizations continuously monitor and assess contractor processes for identifying, analyzing and categorizing facility and activity hazards. DOE-SRS line personnel oversee management of the technical baseline for all facility process and safety systems and conduct surveillances on contractor engineering organizations in support of operations. This ensures that safety documentation accurately reflects the plant/system technical basis and that required safety evaluations are performed. Test plans and test procedures are verified to ensure they accurately reflect plant configuration and to ensure that test acceptance personnel evaluate the performance of contractor engineering organizations as part of operations support. Review and approval of the DSA by DOE-SRS requires development of a SER. This process is defined in SRIP 421.1 (Nuclear Safety Oversight).

6.2.3 Core Function 3: Develop and Implement Hazard Controls

- Primary DOE-SRS Procedural Mechanisms:
 - SRIP 421.1, "Nuclear Safety Oversight,"
 - SRIP 450.4, "Authorization Agreements"

Discussion: SRIP 421.1, "Nuclear Safety Oversight", documents that the responsibility for the development and approval of operational controls derived from hazard analyses of non-nuclear facilities rests with the site M&O contractor. For high-hazard nuclear facilities, DOE developed the concept of AAs, incorporating the results of DOE-SRS reviews of the contractor's proposed safety basis for a defined scope of work.

- The AA contains key terms and conditions (controls and commitments) under which the contractor is authorized to perform work. Any changes to these terms and conditions require DOE approval. In many respects, an AA parallels the license issued by the Nuclear Regulatory Commission for operation of commercial nuclear facilities. Unless specifically exempted by the DOE-SR Manager, AAs are required for all SRS high-hazard activities. AAs are developed in conjunction with startup (or restart) approval by DOE, approval of safety basis documents by DOE, or any other direction provided to the contractor that alters the scope of operations, special terms, or conditions specified by DOE.
- The safety basis consists of the facility design basis and operational requirements relied upon by DOE to authorize operation and is described in documents including the facility DSA and other safety analyses, hazard classification documents, Technical Safety Requirements (TSRs), DOE-issued SERs, and other facility-specific commitments made to ensure compliance with DOE procedures.
- TSRs are important safety basis documents that define the conditions, safe boundaries, and the management or administrative controls necessary to ensure the safe operation of a nuclear facility. TSR controls are also designed to reduce potential risk to workers and the public from uncontrolled releases of radioactive materials or from radiation exposures due to inadvertent criticality. TSRs include safety limits, operating limits, surveillance requirements, administrative controls, use and application instructions, and their bases, in support of the facility DSA. The TSR constitutes an agreement or contract between DOE and the facility operating management regarding the safe operation of the facility.
- USQ Evaluations are also important in maintaining the integrity of safety basis documents. An USQ exists if one or more of the following conditions result: (1) the probability of the occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the DSA could be increased; (2) the possibility of an accident or malfunction of a different type than any evaluated previously in DSA could be created; and (3) a margin of safety could be reduced; or (4) the DSA may not be bounding or may be otherwise inadequate. Inherent in an activity resulting in an USQ is the need for additional controls to be approved by DOE-SRS, necessitating a change to the facility safety basis.

DOE-SRS approves the contractor's USQ procedure in accordance with 10 CFR 830, "Nuclear Safety Management." DOE-SRS oversight of the contractor's USQ program ensures the safety basis approved by DOE remains current and provides adequate level of protection to workers, the public, and the environment.

6.2.4 Core Function 4: Perform Work Within Controls

- Primary DOE-SRS Procedural Mechanisms:
 - SRIP 421.1, "Nuclear Safety Oversight"
 - SRIP 430.1, "DOE-SR Facility Representative Program"

- SRIP 425.1, "Nuclear Facility Startup Approval Process"
- SRM 226.1.1A, "Integrated Performance Assurance Manual (IPAM)"

Discussion: DOE-SRS's mission is to provide leadership, direction, and oversight to ensure that site programs, operations, and resources are managed in an open, safe, secure, environmentally-sound, and cost-effective manner. SRIP 421.1, "Nuclear Safety Oversight", establishes requirements for DOE-SRS oversight of contractor nuclear safety programs and related activities. SRIP 421.1 documents that in general, DOE-SRS's nuclear safety oversight of the contractor includes (a) maintaining a continuous presence and awareness of contractor activities involving nuclear facilities and operations, and their associated safety basis, and identifying, communicating, and resolving nuclear safety issues; (b) performing technical assessments of nuclear safety programs and activities; and (c) reviewing and approving applicable compliance packages, AAs, safety basis documents, and USQ documentation.

DOE-SRS maintains operational awareness of contractor work activities primarily through FRs, as well as Facility Technical Specialists and Site Technical Specialists. In accordance with SRIP 430.1, "Facility Representative Program", FRs spend most of their time observing and assessing contractor operations via operational awareness and performance-based assessments. DOE-SRS FRs are formally qualified as part of the TQP, subject to continuing education requirements, and must qualify on a facility-specific basis.

DOE P 226.1A, "Department of Energy Oversight Policy", and DOE O 226.1A, "Implementation of Department of Energy Oversight Policy" establish the minimum requirements and expectations for a Department-wide oversight process to encourage continuous improvement in the protection of the public, workers, environment, and national security assets. The objective of the Order is to ensure that contractor assurance systems and DOE oversight programs are comprehensive and integrated for key aspects of operations essential to mission success. DOE-SRS has implemented the requirements of and expectations embodied in DOE P 226.1A and DOE O 226.1A through Savannah River Manual (SRM) 226.1.1A, "Integrated Performance Assurance Manual (IPAM)." The IPAM describes the non-Facility Representative-related DOE-SRS processes comprising the Contractor Oversight System. These processes support the collection, analysis and reporting of information that may be used by DOE-SRS managers in making decisions about contractor performance at the SRS. In addition, the DOE-SRS Contractor Oversight System is designed to promote integration of assurance-related activities among SRS contractor operations to support consistent implementation of performance assurance. The IPAM also describes how DOE-SRS evaluates the effectiveness of the DOE-SRS Contractor Oversight System through self-assessments, independent internal assessments and performance measures.

DOE-SRS is also responsible for performing reviews and assessments in support of contractor readiness assessments and operational readiness reviews. SRIP 425.1 documents the process for DOE-SRS review and approval of nuclear facility startups and restarts.

6.2.5 Core Function 5: Provide Feedback and Continuous Improvement

- Primary DOE-SRS Procedural Mechanisms:
 - SRM 226.1.1A, "Integrated Performance Assurance Manual (IPAM)"
 - SRM 300.1.1B, Chapter 5.2, "DOE-SR Performance Management Process"
 - SRIP 430.1, "DOE-SR Facility Representative Program"
 - SRIP 420.1, "DOE-SR Notification to the Contractor of an Adverse Condition/Stop Work Order"
 - SRIP 442.2, "Resolution of Differing Professional Opinions for Technical Issues Involving Environment, Safety, or Health"
 - SRM 414.1.1C, "Quality Assurance Program Manual"
 - M&O Contract Number DE-AC09-96SR18500, Modification Number M161, DOE-SR and NNSA-SRSO "Performance Evaluation and Measurement Plan and Contract Management/Oversight"

Discussion: Two primary mechanisms exist for DOE-SRS feedback and continuous improvement processes. Each DOE-SRS line organization is responsible for conducting self-assessments of activities under their purview, and reporting the results in SIMTAS. As an enhancement to the self-assessment program during Fiscal Year 2008, the DOE-SR Office of Safety and Quality Assurance will identify one self-assessment to be conducted by all DOE line organizations. Results for the DOE-SRS wide self-assessment will be analyzed by the Performance Assurance Division (PAD) and reported to the Performance Assurance Council and Executive Technical Management Board. In addition, the PAD conducts independent assessments as required by the Integrated Performance Assurance Manual. Independent assessments may address a variety of topical or functional areas, or may be focused on addressing emerging items of interest to DOE-SRS managers. Similar to all other oversight activities, independent assessment results are documented in SIMTAS, and the results are briefed to the Executive Team.

Additionally, supervisors provide performance feedback to the staff by performing job performance evaluations/job performance ratings in accordance with SRM 300.1.1B, Chapter 5, Section 5.2 (Performance Management Process). This process ensures that the staff's performance and development plans (P&DP) accurately capture the DOE-SRS Organizational Performance Management Plan elements and that they are being satisfactorily performed. DOE-HQ also monitors SRS performance through selected performance indicators and assessments (typically assembling a team including HQ staff, Federal, and contractor staff from other DOE sites and outside consultants).

Outside organizations, such as the DNFSB and the South Carolina Department of Health and Environmental Control, also assess SRS activities and provide valuable feedback (SRM 226.1.1A Type 3 Assessments). Some of these assessment activities result in recommendations for improvement; others could result in fines or penalties if performance is not satisfactory. The DOE-SR Organizational Performance Management Plan is modified, as necessary, to incorporate improvements identified through these processes/sources.

Numerous formal and informal mechanisms exist to obtain and communicate feedback on DOE-SRS and contractor activities (see Figure 5 below.).

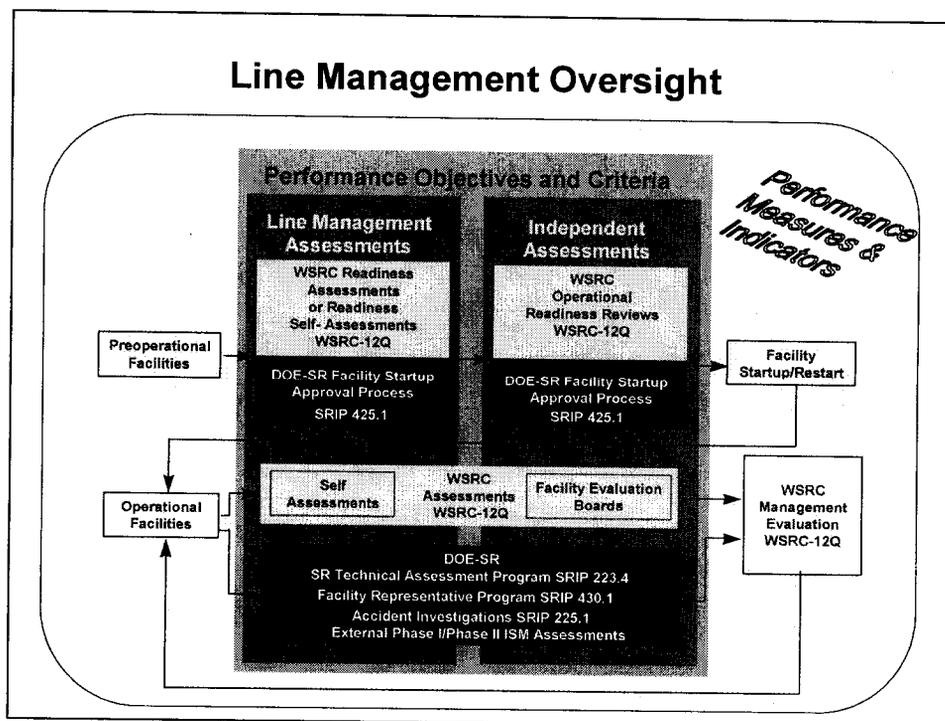


Figure 5 - SRS Assessment Model

Specifics of the organizational structure, roles, and responsibilities of Federal personnel for the M&O contract management and oversight are provided in the Performance Evaluation and Measurement Plan, Part I of III of the M&O Contract Modification Number M161.

DOE-SRS FRs observe facility operations and provide real-time informal and formally documented feedback related to facility operations and program implementation. Type 1 and Type 2 assessments, including management walkthroughs, operational awareness activities, or technical program reviews, serve as a formally documented source of contractor feedback and may include evaluations of assurance system implementation, including contractor self-assessment and/or lessons learned implementation. Assessment results are documented in SIMTAS and are reviewed by PAD. As a program enhancement, during Fiscal Year 2008, PAD will review SIMTAS reports semi-annually to determine if trends exist, or if there is information that should be extracted and captured as lessons learned for dissemination across the SRS.

Special DOE-SRS assessments, including Readiness Assessments, Operational Readiness Reviews, and Safety Basis Document Reviews also evaluate contractor performance and are sources of feedback information. Other activities, ranging from surveillances and document reviews to task team participation, may serve as feedback sources. Feedback may be generated by employees raising concerns outside their chain of command through use of the site Employee Concerns Programs. Employee concerns are investigated and pertinent feedback information is provided to the appropriate organization. Regular monthly meetings with contractor counterparts are important feedback sources. The Performance Evaluation and Measurement Plan, Part II of III, Section B of the M&O Contract Modification Number M161, provides specifics to the EM clean-up incentive. This area of the M&O contract provides the specific consequences for positive and negative performance, which includes poor safety and environmental performance. Contractors are encouraged to self identify and report problems and DOE may reduce fines and penalties in certain areas if they do so (for example, Price Anderson Act as amended activities).

DOE federal and contractor organizations must share operating experience lessons learned with the DOE Complex through the DOE Corporate Lessons Learned database (URL: <http://www.hss.energy.gov/csa/analysis/III/>), using the standard format described in DOE O 210.2, Attachment 5.. The contractor's Lessons Learned Program sorts and screens lessons learned pertaining to the operation of facilities at DOE-SRS, as well as other sites in the DOE complex and commercial nuclear and industrial facilities. The contractor's Lessons Learned Program prepares and distributes lessons learned documents to all site organizations for information and use as appropriate. The Lessons Learned Program is included as an area for review by DOE-SRS when preparing to conduct oversight activities. DOE-SRS line and program offices continually look for ways to improve contractor and DOE activities as part of the daily conduct of business. DOE-SRS personnel observe and participate in contractor critiques. Type 1, Type 2, and other assessments of contractor activities usually reveal Deficiencies, Observations, or Good Practices. Each type of finding is captured and fully documented in an assessment report that is provided to the contractor. Close-out briefings for assessments facilitate the sharing of information across organizational lines, and help prevent stove-piping of information that may be used to improve site performance.

Continuous improvement requires action in areas where feedback has been provided and opportunities for improvement have been identified. Specific direction to the contractor is given in accordance with contract provisions. Management direction and/or a change in procedure is used to effect change within DOE-SRS. Changes made in response to an outside review are usually logged and tracked to closure, with a specific organization assigned the responsibility. With regard to enforcement actions, FRs and designated upper management are authorized to issue "Environment, Safety, and Health Stop Work Orders" when conditions merit.

In addition to the elements discussed under Core Function 4, DOE P 226.1, "Department of Energy Oversight Policy" and DOE O 226.1, "Implementation of Department of Energy Oversight Policy" also define DOE field office oversight responsibility to include reviewing performance against formally established ES&H performance measures. The requirements of DOE P 226.1 and DOE O 226.1 have been incorporated into SRM 226.1.1A, "Integrated Performance Assurance Manual." In accomplishing DOE-SRS's oversight function, cognizant DOE-SRS staff review contractor performance against formally established environment, safety and health performance measures and criteria set forth in the Performance Evaluation and Measurement Plan (PEMP) and in procedures and guidance for specific programs and activities, such as emergency drill/exercise evaluations; oversight of contractor training and qualification program activities; fire protection; radiation protection; environmental protection ; and natural phenomena hazards mitigation. DOE-SRS also uses information on reportable events that is documented and tracked in the Occurrence Reporting and Processing System to identify trends and to assess corrective action effectiveness.

The M&O contractor maintains a number of key performance indicators (KPIs) that were developed jointly with and approved by DOE. Each KPI has an assigned owner and a subject matter expert (SME) by the contractor. DOE-SRS has an assigned SME for each KPI. A number of the performance measures roll up to the DOE-SR Manager's attention, while others are used as tools by the DOE-SRS staff. The KPI status is developed monthly and transmitted to DOE-SRS with analysis indicating current status, trends, and actions being taken. Performance measure charts (Figure 6 next page) for the KPIs are available on ShRINE at <http://clemson.srs.gov/index.htm>. In addition, during Fiscal Year 2008, OSQA has asked the M&O contractor to collect information on a number of leading performance indicators. The data generated from these indicators will be analyzed to determine the efficacy of continuing the leading indicator initiative.

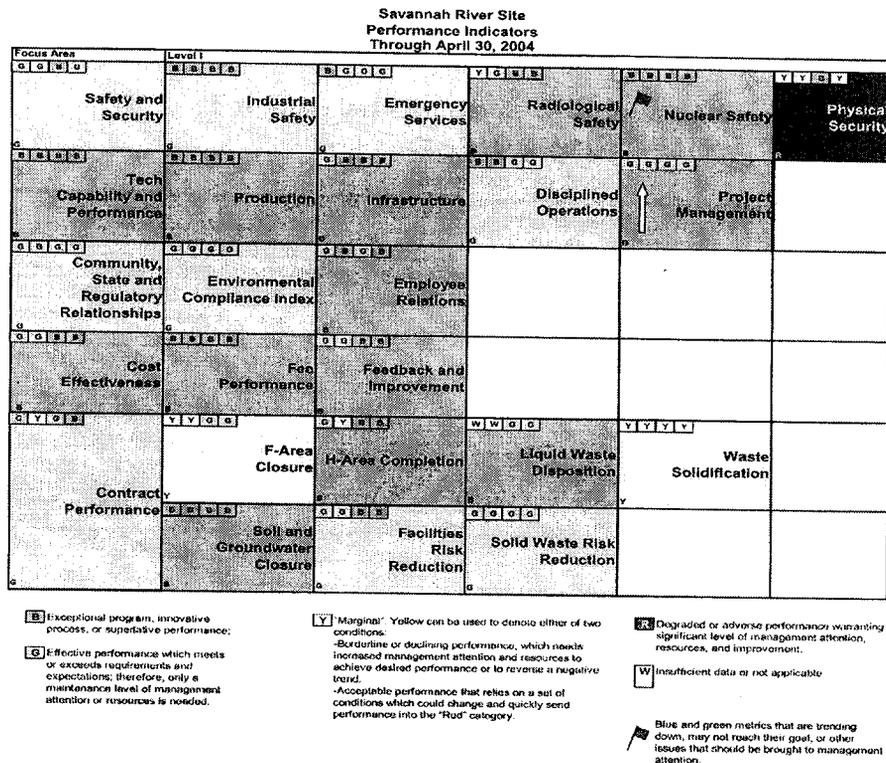


Figure 6 – Example of Key Performance Indicators

6.2.6 DOE-SRS has established an ETMB. The Deputy Manager for Cleanup (DMC) chairs the Board. The members are DOE-SRS line managers. The ETMB is chartered for the purpose of sustaining the DOE-SRS culture of safety, security, competence, and technical excellence and institutionalizing the principles of ISM. The ETMB guides DOE-SRS plans and actions and enables effective Site-wide integration in the following four areas:

- Capability of the Federal Workforce,
- Performance assurance Program including the Facility Representative Program,
- Integrated Safety Management including Safety Basis Documentation, and
- Project Management System

The normal method of operation for the ETMB is to assign tasks to standing committees of DOE-SRS staff chartered by the ETMB to oversee activities within the four areas listed above. The standing committees are:

- Performance Assurance Committee
- Facility Representative Council
- Nuclear Safety Council
- Project Evaluation Board

The standing committees have their own charters and periodically brief the Board.

Appendix
DOCUMENTS CONTAINING DOE-SRS INTEGRATED SAFETY MANAGEMENT SYSTEM
IMPLEMENTING MECHANISMS

DOE-HQ/Other Documents:

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1. DOE M 411.1-1, Safety Management, Functions, Responsibilities, and Authorities Manual
2. DOE O 210.2, "DOE Corporate Operating Experience Program"
3. DOE O 226.1, "Implementation of Department of Energy Oversight Policy"
4. DOE P 226.1, "Department of Energy Oversight Policy"
5. DOE O 231.1A, "Environment, Safety and Health Reporting"
6. DOE M 231.1-2, "Occurrence Reporting and Processing of Operations Information"
7. DOE O 420.1B, "Facility Safety"
8. DOE O 430.1B, "Real Property Asset Management"
9. DOE O 435.1, "Radioactive Waste Management"
10. DOE O 450.4-1, "Integrated Safety Management System Manual"
11. DOE O 451.1B, "National Environmental Policy Act Compliance Program"
12. DOE P 430.1, "Land and Facility Use Planning"
13. DOE-EM-STD-5502-94, "Hazard Baseline Documentation"
14. DOE-STD-1027-92, "Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports"
15. DOE-HDBK-3027-99, "DOE ISMS Verification - Team Leader's Handbook"
16. 10 CFR 830, "Nuclear Safety Management"
17. 10 CFR 835, "Occupational Radiation Exposure"
18. 10 CFR 851, "Worker Safety and Health Program"
19. 48 CFR "Federal Acquisition Requirements"
20. Department of Energy Office of Environmental Management Safety Management Functions, Responsibilities, and Authorities Document
21. M&O Contract Number DE-AC09-96SR18500, Modification Number M-161
22. WSRC-RC-94-1268, "SRS Standards and Requirements Identification Document"

Note: Washington Savannah River Company's "Integrated Safety Management System Description" is documented as part of the SRS Standards/Requirements Identification Document (WSRC-RP-94-1268).

Wackenhut Services, Inc.'s "Integrated Safety Management System Description" is included in their S/RID FA-00 as an attachment.

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DOE-SRS Documents:

1. SRIP 150.3, "DOE-SR Emergency Management Program"
2. SRIP 225.1, "Accident Investigations" (as amended by SRN 07-01)
3. SRIP 251.2, "Oversight of Contractor S/RID Activities"
4. SRIP 253.1, "Preparation and Approval of DOE-SRS Directives"
5. SRIP 361.1, "DOE-SR Oversight of Contractor Technical Training and Qualification Program Activities"
6. SRIP 420.1, "DOE-SR Notification to the Contractor of an Adverse Condition/Stop Work Order"
7. SRIP 421.1, "Nuclear Safety Oversight"
8. SRIP 425.1, "Nuclear Facility Startup Approval Process"
9. SRIP 430.1, "DOE-SR Facility Representative Program"
10. SRIP 440.1, "DOE-SR Fire Protection"
11. SRIP 440.3, "DOE-SR Federal Employee Occupation Safety and Health (FEOSH) Program"
12. SRIP 441.1, "Radiation Protection"
13. SRIP 442.1, "SR Employee Concerns Program"
14. SRIP 442.2, "Resolution of Differing Professional Opinions for Technical Issues Involving Environment, Safety, or Health."
15. SRIP 450.1, "DOE-SR Environmental Protection Program"
16. SRIP 450.4 "Authorization Agreements"
17. SRM 130.2.1A, "Management Plan for Planning, Budgeting, Work Authorization, and Control"
18. SRM 226.1.1A, "Integrated Performance Assurance Manual"
19. SRM 300.1.1B, Chapter 1, Section 1.1, "SR Functions, Responsibilities and Authorities Procedure"
20. SRM 300.1.1B, Chapter 1, Section 1.2, "DOE-SRS Organizational Configuration Control Process"
21. SRM 300.1.1B, Chapter 2, Section 2.1, "DOE-SR Position Management and Classification Process"
22. SRM 300.1.1B, Chapter 3, Section 3.1, "DOE-SR Merit Promotion and Placement Process"
23. SRM 300.1.1B, Chapter 5, Section 5.2, "DOE-SR Performance Management Process"

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DOE-SRS Documents:

24. SRM 300.1.1B, Chapter 6, Section 6.1, "DOE-SR Technical Qualification Program and Acquisition Career Development Program Process Procedure"
25. SRM 300.1.1B, Chapter 6, Section 6.2, "DOE-SR Training and Continuing Education Processes"
26. SRM 414.1.1C, "Quality Assurance Program Manual"
27. SRM 435.1B, "Radioactive Waste Management Manual"
28. SRM 410.1.1D, "Project Management Manual"
29. SRP 06-06, "DOE-SR Employee Concerns Program"
30. SRP 05-04, "SRS Environmental Management System Policy"
31. SRP 05-03, "SRS Workplace Safety, Health, & Security Policy"
32. SRP 06-02, "DOE-SR Safety Integration of Early Design Phases"
33. SRN-07-01, "Change to DOE O 225.1A, 'Accident Investigations'"