

**U.S. Department of Energy  
Oak Ridge Office**



**Integrated Safety Management Program  
Description**

**08/09/2007**

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## Acronym List

AMESH	Assistant Manager for Environment, Safety, and Health
AMNFS	Assistant Manager for Nuclear Fuel Supply
CATS	Headquarters Corrective Action Tracking System
CFR	Code of Federal Regulations
COR	Contracting Officer's Representative
DARTS	DOE Audit Report Tracking System
DEAR	DOE Acquisition Regulation
DOE	Department of Energy
E-mail	Electronic Mail Message
EMS	Environmental Management System
ES&H	Environment, Safety, and Health
FEOSH	Federal Employee Occupational Safety and Health
FRAM	Functions, Responsibilities, and Authorities Manual
IDP	Individual Development Plan
ISM	Integrated Safety Management
ISMS	Integrated Safety Management System
ISSM	Integrated Safeguards and Security Management
ORO	Oak Ridge Office
QAP	Quality Assurance Program
S/RID	Standards/Requirements Identification Document
STSM	Senior Technical Safety Manager
TQP	Technical Qualification Program
WSS	Work Smart Standards

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## Executive Summary

This document describes the Department of Energy Oak Ridge Office (ORO) Integrated Safety Management (ISM) Program. The ORO ISM Program conforms to the safety management systems described in DOE P 450.4, *Safety Management System Policy*. In ISM, the term *safety* is used synonymously with environment, safety, and health to encompass protection of the public, the workers, and the environment.

The ISM Program defined in this document has two major components. The first component applies to the safety and health of all ORO Federal employees, and the second component applies to the work by ORO staff related to oversight of major contract activities (i.e., the management and operating contractor for the Oak Ridge National Laboratory, the technical services contractor for the Oak Ridge Institute for Science and Education, the management and integrating contractor for Environmental Management cleanup work, the contractor at the Transuranic Waste Processing Facility, and the contractor for Uranium-233 downblending).

Safety is a part of every ORO employee's work activity, beginning with project and program planning, through the budget formulation process, authorizing work, performing field oversight of the work, and ending with the feedback that is important to the continuous improvement of the process. The fundamental premise of the ORO and contractor safety management systems is to **Do Work Safely**, and the ORO ISM Program complements the activities of its contractors' ISM systems to ensure that work is indeed performed safely.

The ORO ISM Program integrates all the elements of quality assurance, the Environmental Management System, safety, and health into one system. This system promotes the full inclusion and integration of environmental, safety, health, and quality assurance into the totality of work, such that it is an integral part of the whole—not a standalone program. This ISM Program Description is consistent with the "ORO Quality Assurance Program Description". The ORO Directives System and the Quality Assurance Program establish the framework for rigor and discipline in ORO's operations.

Regardless of the performer of the work, the contractor is responsible for complying with the requirements of DOE Acquisition Regulation (DEAR) clause 970.5223-1, *Integration of Environment, Safety, and Health into Work Planning and Execution*, and DEAR clause 970.5204-2, *Laws, Regulations, and DOE Directives*, if included in the contract. Guidance for contractor implementation is provided in DOE G 450.4-1B, *Integrated Safety Management System Guide*, dated March 1, 2001. These contractors are required to implement an effective ISM system for the facilities they operate. In addition, the Department requires integration of the quality assurance program and the environmental management system into the ISM system, as delineated in DOE O 414.1C, *Quality Assurance*, and DOE O 450.1, *Environmental Protection Program*.

## **1.0 ISM PROGRAM OVERVIEW**

### **1.1 Introduction**

This document describes the overall integrated environment, safety, health, and quality assurance management system that the Department of Energy (DOE) Oak Ridge Office (ORO) implements in accordance with DOE P 450.4, *Safety Management System Policy*, and DOE M 450.4-1, *Integrated Safety Management System Manual*. Important companion documents to this program description are *ORO Management System Description, Manual of Safety Management Functions, Responsibilities, and Authorities, Level III, for Oak Ridge Office (ORO FRAM)*, and *Organization and Structure, Oak Ridge Office Organization Manual*, and , “ORO Quality Assurance Program Description.”

It is important to understand that the term *safety*, when used in the Integrated Safety Management (ISM) context and in this document, encompasses quality assurance, public and worker safety and health, and the environment, including pollution prevention and waste minimization. The ORO ISM Program and each contractor’s ISM System (ISMS) fully incorporate Environmental Management System (EMS) considerations, including pollution prevention, into all work planning and execution. The contractor oversight function ensures that each contractor’s ISMS fully incorporates an EMS into all work planning and execution.

### **1.2 Guiding Principles**

DOE P 450.4, *Safety Management System Policy*, establishes seven guiding principles to provide overall direction and guidance for instituting ISM. ORO embraces these principles and applies them continuously in the conduct of daily business and operations. This section presents the mechanisms used to implement ISM within ORO for contractor activities and the Federal workforce. The crosswalk of ORO documents, processes, and programs with the ISM Core Functions and Guiding Principles is found in Appendix A.

#### **1.2.1 Guiding Principle 1 – Line Management Responsibility**

ORO management is responsible and accountable for the protection of employees, the public, and the environment. To ensure operations are conducted in a safe, environmentally responsible, and compliant manner, the Federal workforce uses the documents in the ORO/DOE Directive System and contracts for its contractors. The ORO FRAM and its companion documents (*ORO Management System Description; Organization and Structure; and Oak Ridge Office Organization Manual*) define the safety-related organization structure, mission, and functions. The Contracting Officer is the Federal agent who has the authority to formally direct the contractor’s actions in work scope and budget. Responsibility for technical direction is usually delegated to the Contracting Officer’s Representative (COR). The COR is the primary point of interaction with the contractor. ORO organizations use DOE Directives and/or line procedures, if needed, to carry out these activities.

The ORO Manager chartered the Safety Attainment Board in March 2005. The purpose of the Safety Attainment Board is to provide an executive, corporate-level overview of safety and health performance within and across ORO while promoting program consistency and a safer work environment throughout all levels. The Safety Attainment Board's mission is to monitor and regularly report safety and health performance trends; identify and promote performance improvements; share lessons learned, advance consistency across ORO; distinguish performance attributes, as well as vulnerabilities, recommend solutions for problem areas; and ensure programs/activities are conducted consistent with the provisions of DOE P 450.4, *Safety Management System Policy*, DOE M 450.4-1, *Integrated Safety Management System Manual*; DOE P 450.5, *Line Environment, Safety and Health Oversight*, and DOE P 450.7, *Department of Energy Environment, Safety and Health (ESH) Goals*.

The Safety Advocates are part of the core members of the Safety Attainment Board. The mission of the Safety Advocates and the Safety Attainment Board is to develop ORO's corporate safety strategy, ensure appropriate mechanisms (programs, procedures, etc.) are in place, and provide analysis of safety data. The Assistant Manager for Science (AMS), Assistant Manager for Environmental Management (AMEM), Assistant Manager for Environment, Safety, and Health (AMESH), and Assistant Manager for Nuclear Fuel Supply (AMNFS) designated senior safety professionals as Safety Advocates for their respective organizations, and these individuals comprise the Safety Advocacy Group.

The ORO Trend Team is composed of representatives from the AMA, AMEM, AMESH, AMNFS, and AMS. This team meets on a periodic basis (generally monthly or more frequently, as needed) to evaluate and discuss trends from assessment and walkthrough findings. The team reports the results of trending analyses to the Safety Advocates and publishes a monthly safety and health trend report, which is posted on the Safety First website. In addition, ORO organizations identify performance indicators and perform their own trending analysis. As part of their oversight function, line organizations review the results of their contractor's trending evaluations.

ORO's Federal employees and contractors are responsible for safe performance of ORO's mission. Emphasis on safe work begins at the worker level with contractor toolbox meetings and plan of the day meetings. Daily reminders to work safely and the personal focus on safety are carried through with the ORO Facility Representatives' day-to-day oversight of operations and feedback to ORO management, including regular meetings with the ORO Manager to discuss safety issues. In addition, ORO line organizations hold regular safety meetings with their contractors.

The position descriptions for ORO personnel with safety responsibilities include a statement on their personal responsibility for the success of ISM. All employees, Federal and contractor, understand their obligation and authority to stop work when conditions are judged to be an imminent threat to health, safety, or the environment in accordance with DOE O 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*, and the *Oak Ridge Operations and National Nuclear Security Administration "Stop Work/Suspend Work" Responsibility* declaration of October 2000.

### **1.2.2 Guiding Principle 2 – Clear Roles and Responsibilities**

The ORO FRAM and its companion documents (*ORO Management System Description; Organization and Structure; and Oak Ridge Office Organization Manual*) contain details on all internal (Federal) safety-related functions, responsibilities, and authorities at ORO. ORO utilizes various tools to ensure that environment, safety, and health (ES&H) are included in Federal employees' roles and responsibilities. These include position descriptions and performance appraisal plans. ORO organizations use DOE Directives and/or line procedures, if needed, to carry out these activities.

### **1.2.3 Guiding Principle 3 – Competence Commensurate with Responsibility**

The ORO process used to fill a position is covered by Federal regulations, DOE Directives, and Human Resources Division procedures. See Figure 1 on the following page for an overview of the ORO process for competence commensurate with responsibility. ORO organizations use DOE Directives and/or line procedures, if needed, to carry out these activities.

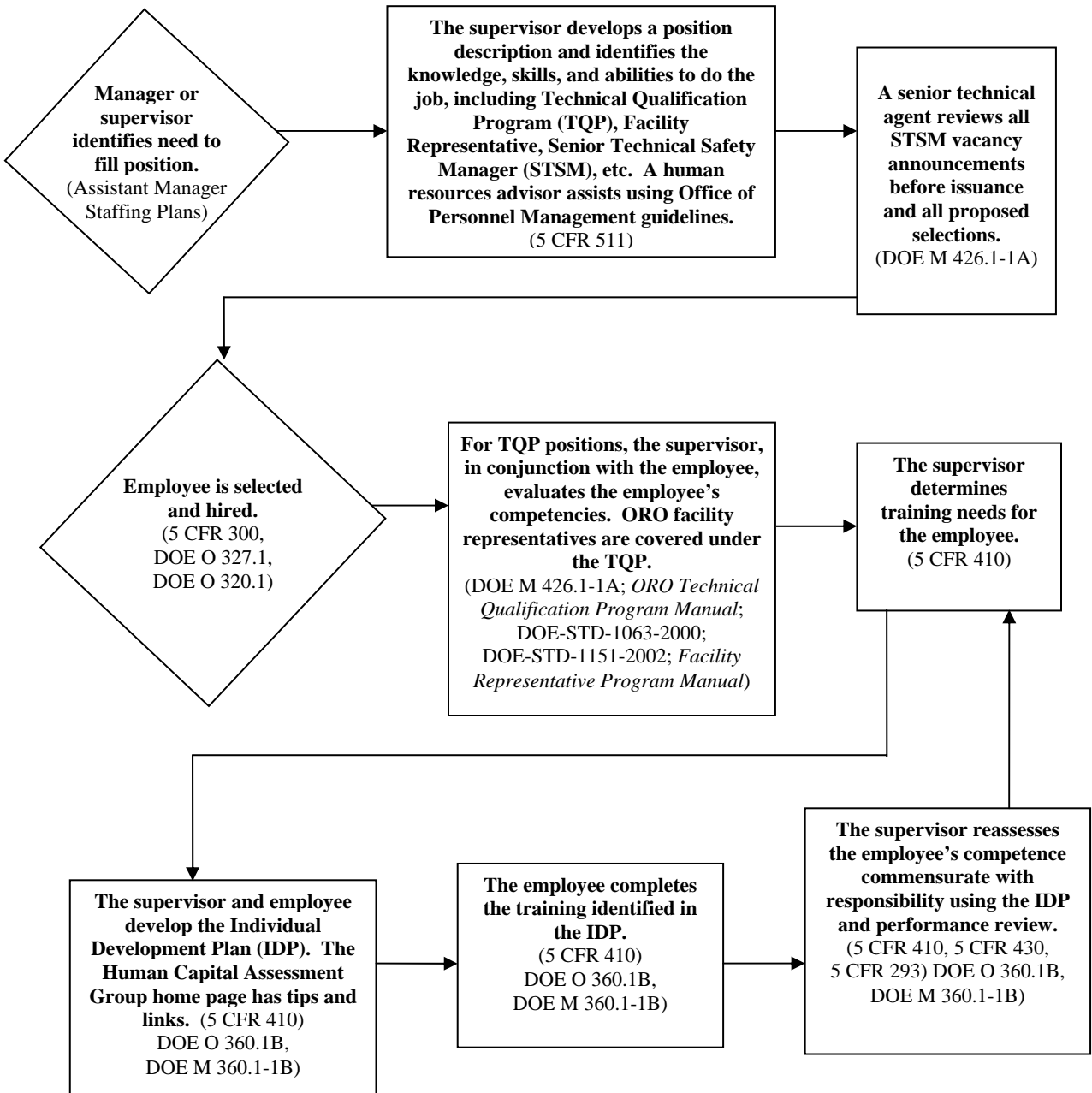
In support of the ORO mission, ORO maintains a highly qualified staff. ORO has representation in the DOE Federal Technical Capability Panel. New technical personnel are assigned appropriate qualification standards based on their job function and determination by their supervisor in consultation with the Human Resources Division, and they are given 18 months for completion. The qualification status is provided in a weekly report to management from the Human Resources Division. ORO uses the Individual Development Plan (IDP) process to ensure that personnel receive the appropriate training.

ORO staffing is maintained at the required levels. The *Annual Workforce Analysis and Staffing Plan for Facility Representatives and Safety System Oversight Personnel* is a key element of the safety staffing process. Each organization generally possesses personnel of the correct skill mix, and any shortages are overcome through reallocation of budget and various staffing alternatives, such as assignment of collateral duties, matrixed personnel, directed transfer, support service subcontractors and, in some cases, retraining of personnel.

### **1.2.4 Guiding Principle 4 – Balanced Priorities**

The *Oak Ridge Office Annual Performance Plan* flows from the President's Management Agenda, the DOE Headquarters' strategic goals and contract objectives, with the *Oak Ridge Office Annual Performance Plan* being used to reconcile the short-term goals and long-term goal to continue to serve the broader national mission.

Contractors with DOE Acquisition Regulation (DEAR) clause 970.5223-1 in their contracts annually submit ES&H performance objectives, performance measures, and commitments to ORO for review and approval as required by the DEAR clause. The purpose of this yearly requirement is to mutually establish ES&H performance objectives, performance measures, and commitments in response to ORO's program and budget execution guidance. Some of the ORO work scope is defined in formal



**Figure 1. ORO Competence Commensurate with Responsibility Process**

agreements and Consent Orders negotiated with external regulators. ORO organizations use DOE Directives and/or line procedures, if needed, to carry out these activities.

### **1.2.5 Guiding Principle 5 – Identification of Safety Standards and Requirements**

ORO, in collaboration with each contractor, has established a comprehensive list of safety standards that apply to the contractor's operations.

### **1.2.6 Guiding Principle 6 – Tailor Hazard Controls to Work**

Tailoring hazard controls to the work you perform as a Federal employee may not be as necessary as it is to the type of work our contractors perform. The types and number of hazards connected with the ORO workforce are not as high risk as those to which our contractors are exposed. However, this does not mean that cutting corners on tasks is a form of tailoring. Improper lifting, improper use of extension cords, cabinets and files not secured properly, and wet areas or items on hard floors that may cause a fall are examples of conditions and activities that may be interpreted as tailoring but are actually unsafe conditions. Contact your supervisor or a safety point of contact if you have a question. For activities in contractor workspaces, the Federal employee needs to be familiar and comply with applicable contractor ES&H programs and controls.

### **1.2.7 Guiding Principle 7 – Operations Authorization**

ORO authorizes operation of Hazard Category 2 nuclear facilities and the Hazard Category 1 reactor by approving authorization agreements in accordance with *ORO Authorization Agreements*. (Hazard Category 3 nuclear facilities do not require authorization agreements.) The ORO review process is formalized in *ORO Safety Basis Documents Review System*, and Title 10, Code of Federal Regulations (CFR), Part 830, *Nuclear Safety Management*.

In addition, ORO governs startup and restart of nuclear facilities by conducting line management self-assessments, verifications, operational readiness reviews, and readiness assessments in accordance with DOE O 425.1C. ORO organizations use DOE Directives and/or line procedures, if needed, to carry out these activities.

### **1.3 Core Functions**

The five core ISM functions provide the necessary structure for work that could potentially affect the public, the workers, and/or the environment. Within ORO, the functions are applied as a continuous cycle with the degree of rigor appropriate to address the activity and hazards involved. Continuous improvement is sought by the regular and disciplined application of the core functions to all ORO work. Figure 2 on the following page shows the relationship of the ISM core functions. Whereas principles are factors that need to be accomplished, functions define a process to follow.

#### **1.3.1 Core Function 1 – Define the Scope of Work**

By defining the scope of work, the mission is translated into work activities with expectations and tasks that will ensure the performance of the work in a safe and environmentally sound manner. In other words, “What are you going to do or what are you trying to accomplish?” For the Federal workforce, this is covered in organizational charts, goals, and tasks. These are contained in *ORO Organization and Structure*, and in *Oak Ridge Office Organization Manual*. For work involving contractor activities, the scope of work is covered in contracts, annual performance objectives, performance measures, and commitments.

#### **1.3.2 Core Function 2 – Identify and Analyze Hazards**

For contractor nuclear activities, 10 CFR 830 formalizes the hazard review process. The ORO contractor oversight program is described in the *Oak Ridge Office Assessment Manual*.

For Federal employees, the ORO program manager for the Federal Employee Occupational Safety and Health (FEOSH) Program ensures that activity-level hazard reviews are performed specific to ORO employees’ work in accordance with DOE O 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*, and 29 CFR 1960. In 2002, the AMESH provided an on-line ISM questionnaire to ORO Federal personnel. This questionnaire enabled workers to identify and rank the hazards in their workplaces. Via the questionnaire and walkthroughs, ORO management identified, analyzed, and categorized the hazards associated with work activities. Continuing safety is ensured through unannounced, annual safety walkthroughs.

For contractor activities related to the environment, ORO has various programs that ensure appropriate oversight. These include the National Environmental Policy Act Program, environmental protection, environmental regulations, and pollution prevention programs. These programs use existing DOE Directives, such as DOE O 451.1C, *National Environmental Policy Act Compliance Program*; DOE O 450.1, *Environmental Protection Program*; and DOE 5400.5, *Radiation Protection of the Public and the Environment*; as well as the *ORO General Environmental Protection Program*; *ORO Management System Description*; *ORO Organization and Structure*; and *Oak Ridge Office Organization Manual*. Line program managers develop and use line procedures, if needed.

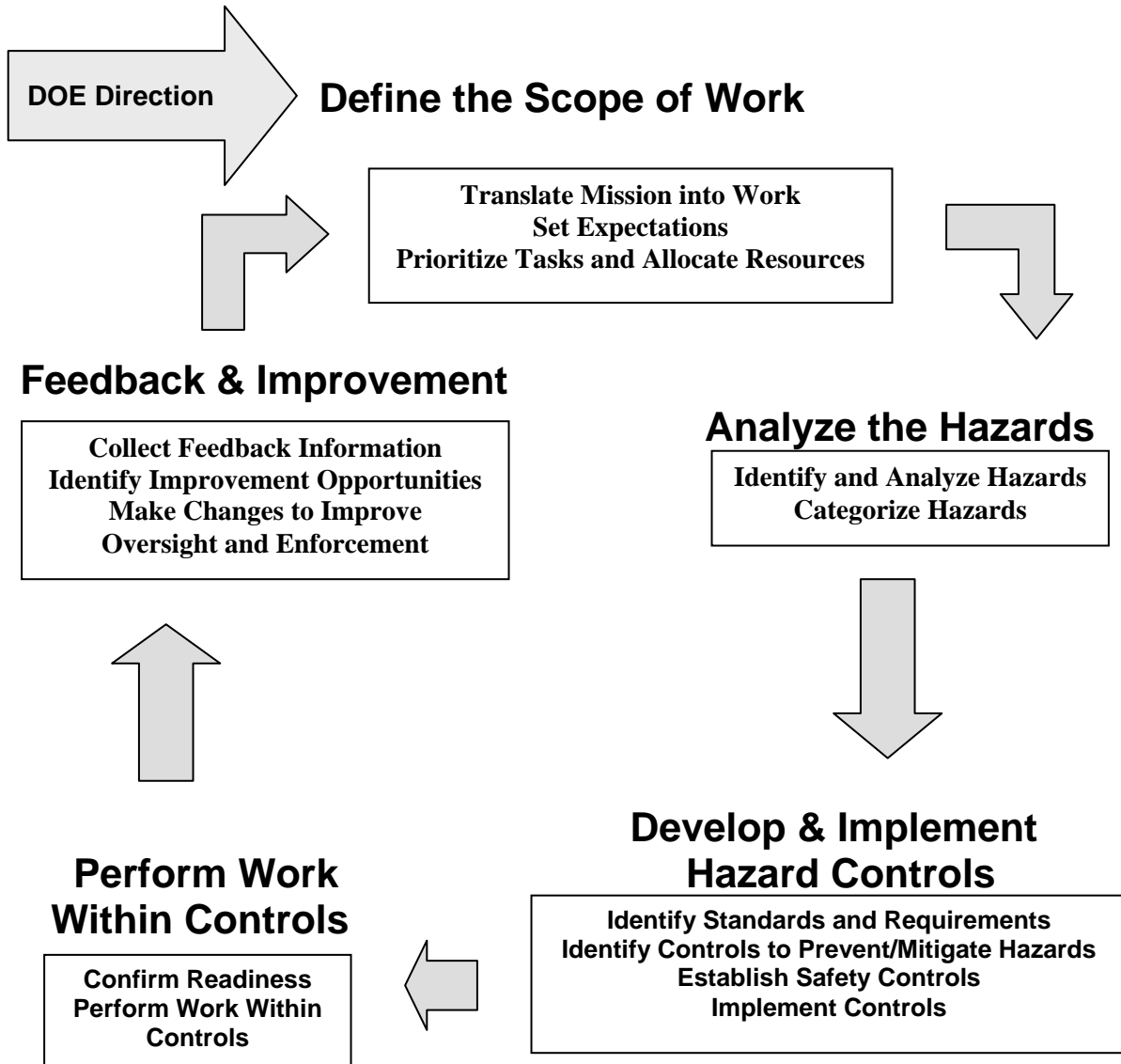


Figure 2. Relationship of the ISM Core Functions

### 1.3.3 Core Function 3 - Develop and Implement Controls

Once the work or tasks to be performed and the hazards connected to the work have been identified, the controls for these hazards need to be developed and implemented. This is accomplished by using laws, regulations, and existing industrial standards. For the Federal workforce, this means following the FEOSH Program when working in Federal office spaces. For activities in contractor workspaces, the Federal employee needs to be familiar and comply with applicable contractor ES&H programs and controls.

### 1.3.4 Core Function 4 - Perform Work Within Controls

This means **Do Work Safely**. For ORO employees, training and being knowledgeable in the ES&H aspects of the work are important. The Safety First web site has been developed to provide information and assistance to the employees. When in contractor space, ORO employees need to have General Employee Training for the site and other training, as needed, such as radiological worker and hazardous waste operations. When unescorted or acting as an escort, ORO employees need to be familiar with the contractor's controls, such as safety work permits and radiological work permits, as well as following posted signs.

ORO ensure that contractors work safely by performing continuous oversight activities to ensure that the contractors meet the defined expectations and to identify areas that need management attention. Facility Representatives, assisted by subject matter experts, perform day-to-day oversight of nuclear facilities and hazardous operations. The line organizations perform regular oversight assessments of their contractors, assisted by AMESH subject matter experts. ORO's oversight assessments are included on the *Three-Year Assessment Plan* and scheduled/tracked in the *Annual Assessment Schedule* in ORION, which is ORO's assessment and oversight/issues management tracking system.

ORO uses a combination of one-year and three-year assessment schedules to guide performance of assessments. Scheduled assessments are based on a requirements analysis and a survey of each organization to determine the set of assessments that will be performed. From this larger set, a select set of assessments is placed on the ORO *Integrated Assessment Schedule* and entered in ORION, with completion tracked via a War Room performance measure. The War Room is located in the Federal Building, and this is where ORO senior management performs monthly reviews of performance progress based on the posted performance measures.

Changes to the *Integrated Assessment Schedule* (deletions, cancellations, or additions) undergo a review before changes are made. This review includes a discussion with management about the need for the change, and management approval must be obtained before changing the schedule. The integrity of this review is maintained through management accountability at weekly and monthly meetings. Along with the scheduled assessments, Facility Representatives and management conduct walkthroughs of facilities and activities. Corrective action tracking is accomplished via ORION. In addition to documenting responsibility, due dates, and the

status of corrective actions, ORION is also used to schedule and document completion of assessments, provide a repository for assessment reports, and provide various performance measures related to system usage and organizational performance in the assessment area.

With respect to contractor performance, reviews of performance evaluation plans agreed upon between the line organizations and the contractors and periodic contractor performance reviews/reports, combined with interviews of line managers and business management personnel, demonstrate that performance measures and goals are an integral part of the contractor evaluation process and are tracked regularly. Typical tools are applied with respect to providing incentives for good performance, including award fee determination, cure letters, etc. The AMNFS organization works through a lease agreement rather than the typical award fee contract arrangement. This landlord-tenant arrangement does not provide the same level of standardization with respect to performance measurement and incentives as an award fee contract; however, management has improvised by implementing innovative solutions such as a corporate review in response to hoisting and rigging problems.

Examples of ORO's performance assurance tools include the following:

- War Room Performance Indicator Charts
- Monthly ORO Trend Reports
- Environmental Management Oak Ridge Monthly Project Performance Review
- Bechtel Jacobs Company LLC Weekly Safety Performance Summaries
- AMNFS Weekly and Monthly Reports to the Office of Nuclear Energy
- AMNFS Quarterly Report on Assurance of Paducah Gaseous Diffusion Plant Operations
- Fiscal Year Mid-Year Performance Reviews of Oak Ridge National Laboratory
- Fiscal Year Self-Evaluation Report of the Oak Ridge National Laboratory
- Fiscal Year UT-Battelle, LLC, Performance Evaluation Plan for Management and Operation of the Oak Ridge National Laboratory

### **1.3.5 Core Function 5 – Feedback and Improvement**

The ORO Federal information management system is composed of computing and communications networks used by Federal employees to facilitate work. Some examples of these are the ORO document management system (Hummingbird DM™), the "Employee News Update," *Inside Oak Ridge*, DOECAST, the Employee Weather Hotline (865-576-9398), and Just Ask. Just Ask is an online forum where employees can post safety questions and get answers from an AMESH safety professional. Questions can be asked anonymously, privately, or shared with the ORO community.

The safety programs functioning at ORO that support contractor activities include oversight, self-assessment programs, independent oversight programs, the Operating Experience Program, the Occurrence Reporting and Processing System, and the ORO Issues and Corrective Action Management Program. These activities are discussed in *ORO Quality Assurance*, and *ORO Accident Investigations*. The ORO safety programs use

computer systems called ORION, the Headquarters Corrective Action Tracking System (CATS), and the DOE Audit Report Tracking System (DARTS); as well as the lessons learned programs; line oversight; the Nuclear Safety Rules; and Price-Anderson Amendments Act enforcement. The Department's electronic tracking system for Office of Health, Safety and Security safety issues, known as CATS, is available at the following internet address: <http://www.eh.doe.gov/camp/trackingsys.html>. ORION is available at the following internet address: <https://orion.oro.doe.gov/>. ORION users follow the *Oak Ridge Office Assessment Program Manual* and the *ORION User Manual*. ORO organizations use DOE Directives and/or line procedures, if needed, to carry out these activities.

*ORO Management Control Program* requires an annual summary management review of all areas within ORO (including contractors) and the identification of any reportable problems for inclusion in the Manager's Assurance Memorandum. The *Oak Ridge Office Assessment Program Manual* ensures that effective programs for evaluating contractor performance and implementing appropriate corrective action are established and maintained.

For results measurement and reward, each contractor's performance is measured throughout the fiscal year utilizing various monitoring and reporting measures. A system of performance measurement is provided in the *ORO Management System Description*, which contains requirements to measure elements such as commitments, cost and schedule, assessments, Facility Representative Field time, etc. Performance measures for these areas are carried out by both the AMESH and the line organizations. Monthly reviews of performance progress based on these measures are conducted in the War Room, where a select set of indices are posted. Performance measures are largely based on cost and schedule of important projects and standard safety measures required by Headquarters (e.g., days away, restricted, or transferred; total recordable cases; and Safety 4.0). Where applicable, DOE Headquarters goals are incorporated as part of the performance measures. In addition to these monthly meetings, monthly reports are prepared and distributed by the AMESH to management and key personnel.

ORO organizations identify performance indicators and perform trending analysis. As part of their oversight function, line organizations review the results of their contractor's trending evaluations and act on the results. In addition, the Safety Advocates meet on a periodic basis (generally quarterly) with the Trend Team to discuss trends from assessment, walkthrough, and event-driven data and may adjust trending code assignments to improve the consistency and usability of data.

Internally, the ORO organizations are accountable for meeting milestones and objectives as stated in the *Oak Ridge Office Annual Performance Plan*. This document is updated and tracked on a monthly basis, and it uses a traffic light methodology to indicate status. From the objectives contained in this document, performance plans are developed for managers and employees. Performance for managers and employees is evaluated through the standard Federal appraisal process, with various methods of awards and recognition applied. ORO organizations use DOE Directives and/or ORO Directives and/or line procedures, if needed, to carry out these activities.

To ensure continuous improvement and to facilitate discussion of lessons learned, a collection of what are deemed the most critical performance measures for the ORO are displayed in an area known as the War Room, which is located in conference room 3046 in the Federal Building. This display is a flexible and dynamic collection of metrics designed to reflect not only those areas of greatest interest and importance to Oak Ridge managers, but also those areas of greatest interest to DOE Headquarters. The metrics include key schedule, cost, and other performance data for the primary program areas of Science, Environmental Management, and Nuclear Fuel Supply; key ES&H performance trends; status of progress toward the President's Management Agenda; major contract actions; small business goals; and diversity trends and statistics. The performance metrics are updated monthly by an analytical team and the status is discussed each month by senior management as the primary focus of one of their standing staff meetings. Coupled with the ORO *Integrated Assessment Schedule* and the status discussions on the milestones and objectives in the *Oak Ridge Office Annual Performance Plan*, the performance measures displayed in the War Room support the necessary, comprehensive, and integrated methodology to ensure feedback and continuous improvement.

The ORO Operating Experience Program applies a multitiered approach to disseminate this type of information to both upper management and the staff. ORO makes use of lessons learned coordinators in the line organizations, coupled with lessons learned personnel within the AMESH organization to ensure distribution of valuable information obtained both internal to the Oak Ridge Reservation and at other DOE sites. Line organization lessons learned coordinators work with their contractor counterparts to extract and distribute pertinent information via weekly electronic mail messages (e-mails). In addition to these lessons learned, the ORO staff receives weekly e-mail correspondence entitled *Items of Interest* and *Lessons Learned Wednesday* from the AMESH organization, which provides further work-related lessons learned data from national databases, as well as information on personal safety and security and consumer alerts. In addition to the ORO effort, many personnel are on the direct distribution lists from the DOE Headquarters lessons learned and occurrence reporting systems.

Examples of performance improvement tools include the following:

- Integrated Assessment Schedule
- Three-Year Assessment Plan
- War Room Performance Indicator Charts
- Safety Attainment Board Meetings
- Monthly ORO Trend Reports
- Meetings between Safety Advocacy Group and the TrendTeam
- ORO TQP Statistical Reports (Weekly and Monthly)
- Weekly Report on ORO TQP Participants with Outstanding Requirements by Month and Organization
- TQP Quarterly Reports
- IDPs
- Manager's Action Tracking System
- Annual Performance Plan

- ORO Safety and Health Committee Meetings
- Items of Interest
- Lessons Learned Wednesday

#### **1.4 Federal Occupational Safety and Health Program**

The ORO Federal Employee Occupational Safety and Health Programs (FEOSH) Program is carried out in accordance with 29 CFR 1960, *Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters*. ORO has established a Safety and Health Committee as a forum for employees to be involved directly in the safety and health processes. The *Safety and Health Committee Charter* is posted at <http://www-internal.oro.doe.gov/esq/safetyfirst/Charter.pdf>. The Safety First web site is an information sharing site for ORO employees. The links on this page contain important sources of information concerning safety news, procedures, updates, and events. The url for the Safety First website is <http://www-internal.oro.doe.gov/esq/safetyfirst/index.aspx>.

ORO has initiated safety programs for Federal employees. Supplemental to the mandatory ISMS training that is provided as part of our existing employee safety programs, ORO has developed Safety Awareness Weeks that are held throughout the fiscal year. The Safety Awareness Weeks consist of week-long activities that focus on a particular safety topic and are beneficial to employees at work and at home, where feasible. For example, traffic safety, fire prevention, hoisting and rigging, electrical safety, and fall protection are the safety topics for fiscal year 2007. In addition, safety awareness activities for slips, trips, and falls, along with work planning and control, are conducted throughout the year.

The ORO ISM Program is applicable to general office work performed by ORO Federal employees within the Federal facilities under ORO's purview. These facilities are occupied by DOE Federal and contractor employees who work in an office environment. ORO employees working in general office areas are expected to be knowledgeable of hazards, controls, safe work practices related to their work environment, and they are held accountable for performing their work within the controls. Management controls safety through various activities, and annual ISMS training is mandatory. ORO employees must comply with all applicable regulations and requirements.

Many DOE workers also perform work outside of an office environment. This work takes place in facilities and areas that are covered by the contractors' health and safety plans, programs, and procedures. DOE employees need to be familiar with the hazards and work practices identified by the contractors for these facilities and areas, and they must comply with all applicable regulations and requirements.

#### **1.5 Contracts**

ORO's contracts are one of the most significant components of the ORO ISM Program, since they apply to oversight of contractor programs. The contract delineates ES&H requirements and expectations that ORO personnel administer and oversee. A specific contract clause (DEAR 970.5223-1, *Integration of Environment, Safety, and Health into Work Planning and Execution*) mandates the institutionalization of an ISMS and states that management of ES&H

functions and activities must be an integral and viable part of the contractor's work planning and execution processes. Contracts with high hazards include this DEAR clause and 10 CFR 851. Contracts with low hazards, such as office activities, include safety and health program requirements and 10 CFR 851 but do not include this DEAR clause.

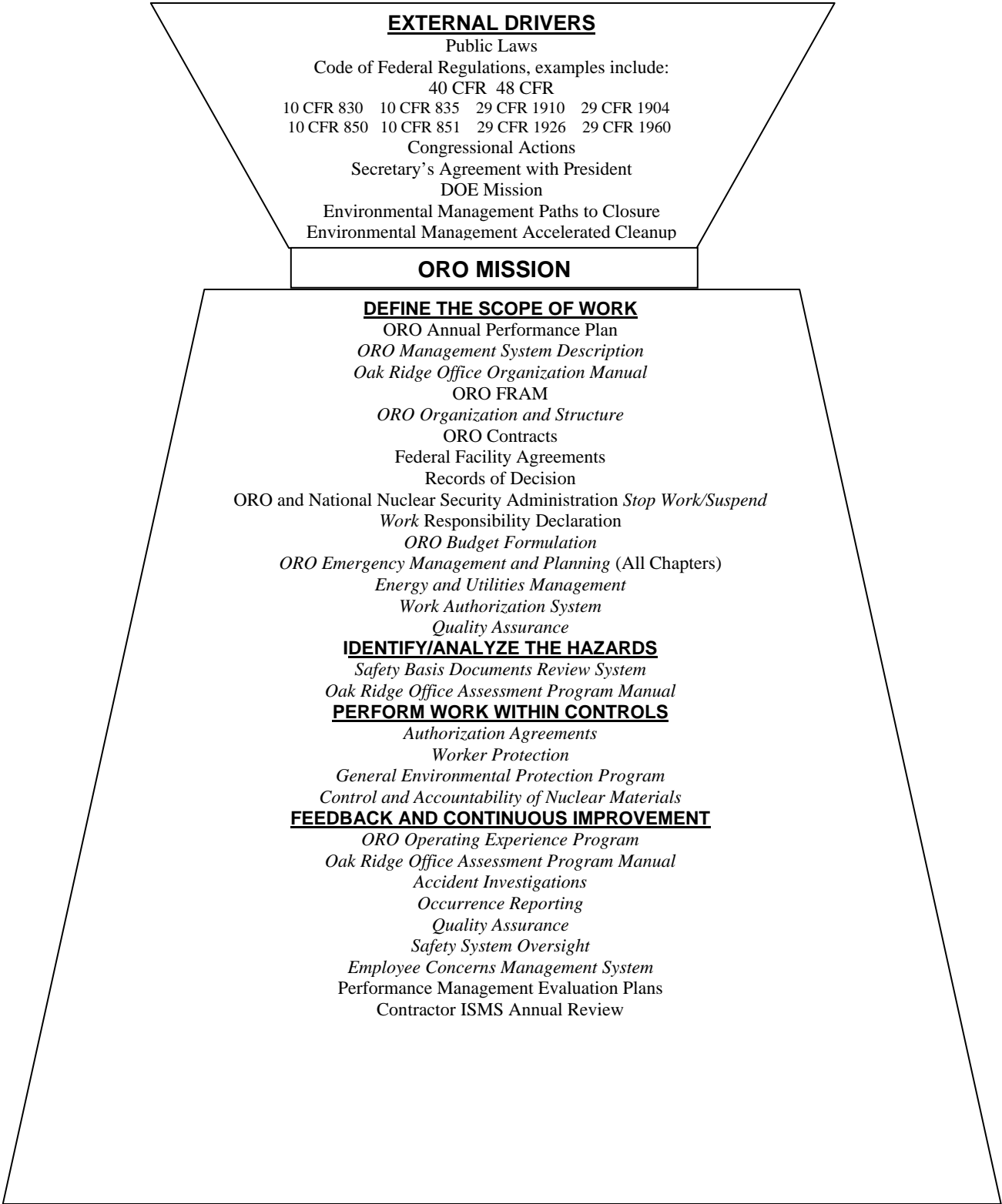
## **1.6 ORO Planning Alignment Process**

The purpose of planning alignment is to integrate management strategies so that missions are translated into work to be completed by the contractor within the available budget and resources. Alignment of ORO's business, budget, and contract responsibilities is divided into four categories based on the sequence of activities (planning, work/budget authorization, information management, and results measurement/rewards).

DOE Headquarters provides overarching mission goals through the Department's Strategic Plan and key Headquarters Program Office guidance documents. The *Oak Ridge Office Annual Performance Plan*, which can be accessed through the ORO Manager's web page, link ORO's core competencies and values to the office activities. Execution year planning incorporates many other key documents, such as the DOE Strategic Plan, Office of Science Strategic Plan, the President's Management Agenda goals and priorities, and the *Oak Ridge Office Annual Performance Plan*, to carry out these activities.

For work/budget authorization, ORO has several key business processes that work together to provide an integrated program. Formal flowdown of DOE work authorization requirements is found in *ORO Work Authorization System*. DOE O 413.3A, *Project Management for the Acquisition of Capital Assets*, provides DOE personnel with project management direction for the acquisition of capital assets. ORO organizations use DOE Directives and/or ORO Directives and/or line procedures, if needed, to carry out these activities.

The *Oak Ridge Office Assessment Program Manual* implements a process of reviewing contractor activities. ISMS budget information is requested each year in the local Budget Formulation Handbook to provide information to local senior management.



**Figure 3**

Contractor oversight encompasses independent reviews, for-cause reviews, internal assessments, and day-to-day surveillance of activities. ORO's assessment programs are described in line program procedures.

### **1.8 ORO Quality Assurance Program**

DOE O 414.1C, *Quality Assurance*, defines a Quality Assurance Program (QAP). The ORO QAP is a management system which ensures that ORO's missions, policies, and objectives are integrated into standard business practices and work processes for Federal operations and contractor oversight, and it is described in *Quality Assurance*. "ORO Quality Assurance Program Description," reflects DOE O 414.1C. ORO organizations use DOE Directives and/or ORO Directives and/or line procedures, as needed, to carry out these activities.

### **1.9 ORO Environmental Management System**

The ORO QAP integrates several management systems such as the ISM Program and the EMS.

### **1.10 ORO Emergency Management Program**

Emergency management is an important function of contractors at ORO's sites and of the Federal program at the office buildings occupied by ORO and contractor employees. For the contractors' operations, the ORO Emergency Management Program is maintained in accordance with DOE O 151.1C, *Comprehensive Emergency Management System*. *Comprehensive Emergency Management System*, assigns responsibilities within ORO for implementing the Order requirements.

The Federal Building Complex Emergency Management Program addresses emergency planning and response for buildings occupied by the ORO workforce. It is maintained in accordance with 29 CFR 1910.38, *Employee Emergency Plans and Fire Prevention Plans*, and the General Services Administration *Occupant Emergency Program Guide*. ORO employees and contractor employees who are collocated in the buildings serve on the Occupant Emergency Organization.

### **1.11 ORO Integrated Safeguards and Security Management Program**

An Integrated Safeguards and Security Management (ISSM) program has been implemented to promote security awareness at all levels and identify that personnel are accountable for security in daily activities. Oversight of contractor actions on classified and unclassified cyber systems is maintained to assure protection of computer equipment and systems. Information on the ORO ISSM Program is available at [http://www.oro.doe.gov/ISSM\\_Portal/default.htm](http://www.oro.doe.gov/ISSM_Portal/default.htm).

## **2.0 ISM PROGRAM MAINTENANCE PROCESS**

Annual and ongoing activities to assess, evaluate, update, and improve the way ORO's business is conducted are part of the Federal workforce scope of work. They include continuous oversight of the contractors and internal ORO activities. ORO organizations use DOE Directives and/or ORO Directives and/or line procedures, if needed, to carry out these activities.

### **2.1 ISM Program Description Maintenance and Training**

The ORO ISM Champion annually reviews and proposes updates, if needed, to this program description. ORO has instituted mandatory annual ISMS training for all ORO Federal employees and direct/support service contractors. The purpose of this training effort is to help all ORO staff acquire the appropriate level of ISMS knowledge to be applied in the conduct of daily business and operations. ORO set up two tracks of ISMS training. Track 1 is for Federal Non-TQP participants or administrative contractor employees, and Track 2, which is a more in-depth course, is for Federal TQP participants or technical contractor employees.

### **2.2 ISM Effectiveness Determinations**

ORO's annual ISM declaration submittal to the appropriate Program Secretarial Offices is developed based on criteria provided by the Program Secretarial Offices. ORO's line organizations review their contractors' ES&H programs and ISM implementation throughout the year. The results of these assessments are reviewed to determine the overall status of the ISM programs. In addition, the Assistant Managers may direct an additional review of the contractor's ISM program, or the ORO Manager may direct special assessments to determine the status of various components of the Federal or contractor ISM programs. The AMESH coordinates compilation of the ORO ISM declaration, and the annual ISM declaration is submitted to Headquarters at the end of September each year.

### **2.3 Safety Performance Objectives, Measures, and Commitments**

ORO line managers award contracts, administer contracts, oversee and assess contractor and Federal performance, and provide day-to-day oversight of ongoing programmatic and project planning activities. They ensure that contract programmatic performance meets technical/safety, budget, and schedule requirements and constraints. Line managers ensure, through mechanisms such as the Contracting Officer-COR relationships, that contract performance is assessed to ensure that contract requirements, including ES&H requirements, are being met.

ORO strives to improve contractor performance by being a demanding customer that expects ORO's contractors to **Do Work Safely**. This is further evidenced by ORO's use of performance measures and performance-based incentives. The performance-based incentives are based on guidance from Headquarters and ORO's goals and objectives. The performance-based incentives contain performance agreements that specify additional details regarding expectations, performance metrics, and the breakdown of the fee among multiple milestones, measures, and deliverables. Changes to the Performance Evaluation and Measurement Plan are made through a change control process.

Contractors with DEAR 970.5223-1 in their contracts annually submit ES&H performance objectives, performance measures, and commitments to ORO for review and approval as required by the DEAR clause. The purpose of this yearly requirement is to mutually establish ES&H performance objectives, performance measures, and commitments in response to ORO's program and budget execution guidance.

ORO's performance indicators are separate and distinct from the contractors' performance indicators, which are related to actual mission and program execution. The ORO performance indicators measure the overall effectiveness of ORO in executing its contractor oversight duties, including improving contractor performance. ORO's performance indicators measure progress (planned versus actual) against Facility Representative field time, established schedules and criteria for assessment schedules, Corrective Action Tracking System, the TQP and training, commitment closure, injury/illness, customer contacts, diversity, deficiency tracking in ORION, independent/external assessment results, lessons learned, occurrence reporting, program direction, and staffing.

ORO's performance is also monitored through regularly scheduled status and performance reviews such as staff meetings and all-hands meetings. The AMESH organization prepares the *ES&H Status Report* for senior management. This periodic report tracks ES&H performance for occurrences, injuries and illnesses, and issues management. In addition, the monthly War Room meeting is integral to the ORO status and feedback mechanisms.

The *Oak Ridge Office Annual Performance Plan* is an overarching plan to establish and track ORO's progress in meeting annual milestones and performance objectives throughout the fiscal year. The *Oak Ridge Office Annual Performance Plan* ties to the *Department of Energy Strategic Plan* via the goals and applicable key intermediate milestones, to the President's Management Agenda via the goals and applicable DOE objectives, and is cross-walked with the Office of Science Strategic Plan to show areas of Oak Ridge support. In addition, the *Oak Ridge Office Annual Performance Plan* also contains a section on Oak Ridge Federal Management and Infrastructure, which is specific to Oak Ridge and not contained in the other higher-level documents. The *Oak Ridge Office Annual Performance Plan* is supported by organizational and program plans. On a monthly basis, the *Oak Ridge Office Annual Performance Plan* is reviewed and statused by senior management. Areas of concern and issues are addressed as part of the ORO feedback process and continuous improvement program.

## ORO ISM CROSSWALK

### ISM Functions

#### Define the Scope of Work

- DEAR 970.5223-1, *Integration of Environment, Safety, and Health into Work Planning and Execution*
- 10 CFR 830, *Nuclear Safety Management*
- 10 CFR 835, *Occupational Radiation Protection*
- 10 CFR 850, *Chronic Beryllium Disease Prevention Program*
- 10 CFR 851, *Worker Safety and Health Program*
- 29 CFR 1910.38, *Employee Emergency Plans and Fire Prevention Plans*
- 29 CFR 1960, *Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters*
- DOE O 151.1C, *Comprehensive Emergency Management System*
- DOE O 414.1C, *Quality Assurance*
- *ORO Management System Description*
- *Organization and Structure (All Chapters)*
- *Oak Ridge Office Organization Manual*
- *Budget Formulation*
- *Emergency Management and Planning*
- ORO O 250, Chapter II, *Oak Ridge Office Directives System*
- *Federal Labor Standards*
- *Energy and Utilities Management*
- *Management*
- ORO FRAM
- *Packaging and Transportation*
- *General Services Administration Occupant Emergency Program Guide*
- *Contract Statement of Work*
- *Performance Evaluation and Measurement Plans*
- *Oak Ridge Office Annual Performance Plan*
- *Federal Facility Agreements*
- *Records of Decision*
- ORO and National Nuclear Security Administration “Stop Work/Suspend Work Responsibility” Declaration, October 2000
- *Line organization Annual Assessment Plans*

#### Analyze the Hazards

- 10 CFR 830, *Nuclear Safety Management*
- 10 CFR 835, *Occupational Radiation Protection*
- 10 CFR 850, *Chronic Beryllium Disease Prevention Program*
- 10 CFR 851, *Worker Safety and Health Program*
- 29 CFR 1910.38, *Employee Emergency Plans and Fire Prevention Plans*
- *Oak Ridge Office Assessment Program Manual*
- ORO O 250, Chapter V, *Development, Approval, and Maintenance of Work Smart Standards Sets*

- ORO O 250, Chapter VII, *Maintenance of Standards/Requirements Identification Documents*
- *Safety Basis Documents Review System*
- Authorization Basis Documents Review and Approval Process
- WSS Sets
- S/RIDs

#### Develop and Implement Controls

- ORO O 250, Chapter IV, *Impact Assessments*
- ORO O 250, Chapter V, *Development, Approval, and Maintenance of Work Smart Standards Sets*
- ORO O 250, Chapter VII, *Maintenance of Standards/Requirements Identification Documents*
- ORO O 250, Chapter VIII, *Requirements Change Notices*
- *Authorization Agreements*
- *Safety Basis Documents Review System*
- Authorization Basis Documents Review and Approval Process
- Federal and State Environmental Permits
- Baseline Change Control
- ORO Organization-Specific Procedures

#### Perform Work Within Controls

- 40 CFR, *Protection of Environment, Environmental Regulations*
- DOE O 450.1, *Environmental Protection Program*
- DOE O 451.1B, *National Environmental Policy Act Compliance Program*
- DOE 5400.5, *Radiation Protection of the Public and the Environment*
- DOE O 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*
- *Oak Ridge Office Assessment Program Manual*
- *Facility Authorization (All Chapters)*
- *Worker Protection All Chapters)*
- *General Environmental Protection Program*
- *National Environmental Policy Act Compliance Program*
- *Floodplain and Wetland Compliance Program*
- *Endangered Species Act Compliance Program*
- *Control and Accountability of Nuclear Materials*
- Safety Basis Documents Flow down and Implementation
- Authorization Basis Documents Flow down and Implementation
- ORO Organization-Specific Procedures
- Personnel Performance Plans
- WSS Sets
- S/RIDs

#### Provide Feedback and Continuous Improvement

- DOE P 226.1, *Department of Energy Oversight Policy*
- DOE O 210.2, *DOE Corporate Operating Experience Program*
- DOE O 226.1, *Implementation of Department of Energy Oversight Policy*
- DOE O 414.1C, *Quality Assurance*
- *ORO Operating Experience Program*
- *Assessments*

- *Accident Investigations*
- *Oak Ridge Office Assessment Program Manual*
- *Management of Nuclear Materials*
- *Quality Assurance*
- *Management Control Program*
- *Employee Concerns Management System*
- Safety Basis Document Change Packages and Annual Updates
- Authorization Basis Document Change Packages and Annual Updates
- Unreviewed Safety Question Process
- ORO Performance Indicators
- Employee Appraisals
- Self-Assessments
- Manager's Assurance Memorandum
- External Assessments
- Contractor ISMS Annual Reviews
- ORO ISM Program Annual Review
- Performance Evaluation and Measurement Plans
- Occurrence Reporting and Processing System
- ORION
- CATS
- DARTS
- Safety Issues Management System
- Computerized Accident Incident Reporting and Recordkeeping System
- Operating Experience Programs
- *ES&H Status Report*

### **ISM Guiding Principles**

#### Line Management Responsibility for Safety

- DOE P 450.4, *Safety Management System Policy*
- DOE M 450.4-1, *Integrated Safety Management System Manual*
- *ORO Management System Description*
- *Organization and Structure*
- ORO FRAM
- DOE-STD-1063-2006, *Facility Representatives*
- ORO organization-specific procedures
- *Facility Representative Program Manual*

#### Clear Roles and Responsibilities

- 5 CFR 293, *Personnel Records*
- DOE O 320.1, *Acquiring and Positioning Human Resources*
- 5 CFR 300, *Employment (General)*
- 5 CFR 430, *Performance Management*
- 5 CFR 511, *Classification Under The General Schedule*

- *ORO Management System Description*
- *Organization and Structure*
- *ORO O 250, Chapter XI, Delegations and Agreements*
- *ORO FRAM*
- *ORO Technical Qualification Program Manual*
- *Employee Performance Plans*
- *Position Descriptions*
- *ORO Mission Statement*
- *ORO Goals and Objectives*

#### Competence Commensurate with Responsibilities

- *5 CFR 410, Training*
- *DOE O 360.1B, Federal Employee Training*
- *DOE M 360.1-1B, Federal Employee Training Manual*
- *DOE M 426.1-1A, Federal Technical Capability Manual*
- *ORO Management System Description*
- *Employment*
- *Employment of Experts and Consultants*
- *Merit Promotion*
- *Priority Placement and Career Transition Assistance*
- *ORPosition Classification*
- *OSuitability, Position Sensitivity Designations, and Related Personnel Matters*
- *DOE-STD-1151-2002, Facility Representative Functional Area Qualification Standard*
- *TQP*
- *IDPs*
- *Facility Representative Qualification Program*
- *Employee Performance Plans*
- *ORO Staffing Plan*
- *Position Descriptions*

#### Balanced Priorities

- *DOE O 413.3A, Project Management for the Acquisition of Capital Assets*
- *DOE O 327.1, Furlough or Reduction in Force in the Senior Executive Service*
- *ORO Management System Description*
- *ES&H Management Plan*
- *Strategic Plans*
- *Oak Ridge Office Annual Performance Plan*
- *Performance Evaluation and Measurement Plans*
- *Line Annual Assessment Plans*

#### Identification of Standards and Requirements

- *ORO Management System Description*
- *ORO O 250, Standards Management (All Chapters)*

- *Authorization Agreements*
- Organization-specific procedures
- WSS Sets
- S/RIDs
- Material Safety Data Sheets

#### Hazard Controls Tailored to the Work Being Performed

- *Authorization Agreements*
- *ORO Management System Description*
- Safety Basis/Authorization Basis Documents Review and Approval Process
- WSS Sets
- S/RIDs
- Material Safety Data Sheets
- Permits

#### Work Authorization

- 10 CFR 830, *Nuclear Safety Management*
- 10 CFR 835, *Occupational Radiation Protection*
- 10 CFR 850, *Chronic Beryllium Disease Prevention Program*
- 10 CFR 851, *Worker Safety and Health Program*
- DOE O 425.1C, *Startup and Restart of Nuclear Facilities*
- *Authorization Agreements*
- *ORO Management System Description*
- ORO Startup and Restart Process
- Permits