

# REQUIREMENTS MANAGERMENTS

DATED: 01/05/2009

SUBJECT: DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART  
STANDARDS SETS

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1. PURPOSE. This document assigns responsibility and accountability and provides administrative guidance to Oak Ridge Office (ORO). This document correlates to DOE P 450.3, AUTHORIZING USE OF THE NECESSARY AND SUFFICIENT PROCESS FOR STANDARDS-BASED ENVIRONMENT, SAFETY AND HEALTH MANAGEMENT, dated January 25, 1996; and DOE M 450.3-1, THE DEPARTMENT OF ENERGY CLOSURE PROCESS FOR NECESSARY AND SUFFICIENT SETS OF STANDARDS, dated January 25, 1996.
2. APPLICABILITY. The provisions of this document apply to the Federal staff who perform work related to the ORO contracts with List B requirements (List B) administered by the Directives Management Group (DMG).
3. RESPONSIBILITIES.
  - a. Manager. If requested by the Convened Group, approves WSS Sets for initial applications and revisions/changes.
  - b. Divisions of Primary Interest (DPIs) participate in development, confirmation, maintenance, and, when appropriate, approval activities for contractor WSS Sets as requested by the Contracting Officer's Representative (COR).
  - c. Principal Staff participate in development, confirmation, maintenance, and, when appropriate, approval activities for contractor WSS Sets.
  - d. Contracting Officer's Representatives.
    - (1) The COR determines DPI involvement and provides information, as the COR deems appropriate, to the DPI.
    - (2) When appropriate, approves WSS Set revisions/changes.
  - e. Convened Group, Process Leader, Identification Team, Confirmation Team, and Stakeholders are designated positions used exclusively in the WSS Set process. For definitions and responsibilities of these positions, see Attachment 1, of this document.
  - f. Team Leader, Directives Management Group.
    - (1) Provides advice and assistance to ORO staff and contractors on subjects covered in this document.
    - (2) On request from the COR, coordinates with the contractor and Principal Staff to determine the composition of an appropriate Convened Group for an initial WSS development effort or revision to a WSS Set.
    - (3) On request from the COR, works with the contractor to coordinate development, confirmation (if needed), and approval of initial WSS Sets and revisions thereto.

# REQUIREMENTS MANAGERMENTS

DATED: 01/05/2009

- (4) On request from the COR, incorporates approved WSS Sets or revisions/changes into the contract and posts this information on the DMG Home Page.
- (5) Maintains the official WSS Set files for information and historical purposes, if provided by the CORs or their staff.

## 4. REFERENCES.

- a. DOE M 450.3-1, DOE CLOSURE PROCESS FOR NECESSARY AND SUFFICIENT SETS OF STANDARDS, dated January 25, 1996.
- b. DOE G 450.3-1, DOCUMENTATION FOR WORK SMART STANDARDS APPLICATIONS: CHARACTERISTICS AND CONSIDERATIONS, dated February 1, 1997.
- c. DOE-HDBK-1148-2002, WORK SMART STANDARDS USERS HANDBOOK, dated February 1, 2002.

## 5. ATTACHMENT.

Attachment 1 – Guidance for Maintaining the Work Smart Standards Set.

# REQUIREMENTS MANAGERMENTS

DATED: 01/05/2009

Attachment 1

Page 1 of 4

## GUIDANCE FOR MAINTAINING THE WORK SMART STANDARDS (WSS) SET

The following are items to consider when tailoring the change process.

1. Work and its hazards are dynamic. Static sets of requirements (even when carefully developed and fully complied with) cannot be relied upon indefinitely to provide assurance of safety. A number of conditions may indicate a need to revise the WSS Set or some portion thereof. Such conditions could include:
  - Changes in mission and work, or work conditions, resulting in a different set of hazards;
  - Discovery of new hazards or better understanding of existing hazards;
  - Input from Stakeholders, Interested Parties, or Departmental lessons learned that suggests the existing standards set may not be necessary and sufficient to adequately address all hazards;
  - Changes to laws, regulations, standards, or Department of Energy (DOE) Directives that are included in the WSS Set; and
  - Changes in contract or contractor.
2. Effective maintenance of the WSS Set requires continuing vigilance for change. Changes to mission, equipment, facilities, processes, materials, etc., may introduce new hazards. Changes to procedures, personnel or budgets may likewise introduce new circumstances that should be evaluated. New regulations, revision of standards or DOE Directives are also sources of changes that must be evaluated. Robust change control mechanisms are a requirement of Integrated Safety Management and WSS Sets should be controlled through these mechanisms. When changes are noted that may raise safety concerns, the WSS Set standards basis should be evaluated to determine if the WSS Set should be revised. In practice it is considered advisable that the WSS Set contain a standard for controlling the WSS Set. The guiding principle should be that a single standards change control mechanism for controlling all standards, including the WSS Set, should be established as part of the Integrated Safety Management System (ISMS).

Many of the above noted potential change conditions mirror the Necessary and Sufficient (N&S) Process initiation criteria that are stated in DOE M 450.3-1 and discussed in Section 7.1 of DOE-HDBK-1148-2002. These criteria apply not only to an initial application of the N&S Process, but also to subsequent conditions under which the N&S Process may be reinitiated. Change control, therefore, may often amount to reinitiating the N&S Process, although typically on a more limited scale.

3. Change control for a WSS Set should preserve or renew the integrity of the original N&S Process determination of adequacy and feasibility. By design, the N&S Process uses the collective expertise of carefully selected teams to reach a thorough understanding of the work and its associated hazards and to identify and confirm a set of standards that can be implemented to provide reasonable assurance of adequate protection from those hazards. If changes to the resulting WSS Set are not made with fidelity to the N&S Process, then the integrity of the entire standards set, and the assurance of protection that it

# REQUIREMENTS MANAGERMENTS

DATED: 01/05/2009

Attachment 1

Page 2 of 4

represents, may be compromised. "Replacement parts" for the WSS Set must be identified and considered with the same rigor that went into the original WSS Set. Documentation for the approved WSS Set should be sufficient to clearly identify the standards bases. When changes to the WSS Set are made, the WSS Set documentation should be revised to reflect the changes and the bases for those changes. This is of significant importance for maintaining the WSS Set.

4. At the same time, a WSS Set change control process should be simple enough to be readily usable within the existing organizational structure. An overly complex process or one which takes great effort to initiate will only invite disuse, with correspondingly negative impacts to the integrity of the WSS Set. While the change control process should include the basic elements of the N&S Process, it need not (and in most cases, should not) duplicate the scale and scope of the original N&S Process effort. Change control amounts to a focused application of the N&S Process, appropriate to the scope of the proposed change.
5. Change control for the WSS Set is an integral part of the ISMS. Establishment of an ISMS will include a hierarchy of documents to flow down contractual requirements for the work. A change control process is an expected component of such a document system. Since the same document hierarchy will also contain the WSS Set and lower-level requirements flowing from it, the change control process established as part of the ISMS should be designed to handle changes to the WSS Set as well as other site documents. Change control for the WSS Set is therefore not divorced from other site processes, but rather is an integral part of the ISMS.
6. Establishing fixed organizational responsibilities for change control allows change control to be accomplished in a routine manner while preserving fidelity to the N&S Process. And finally, the change control process should screen proposed changes on the basis of their safety significance, so that the system does not become clogged with items of low importance. It may be helpful to collect "minor" changes for periodic (for example, quarterly, semiannual) review by the appropriate team(s) rather than reviewing them individually, or to provide for streamlined processing of certain types of changes.
7. Identification (ID) Teams and Confirmation Teams always require input from contractor, line, workers, and Environment, Safety and Health (ES&H) professionals and from DOE line and ES&H professionals. If multiple work scopes are impacted, select a mix of representatives rather than having each organization provide a representative of each kind. If the Oak Ridge Office (ORO) ES&H professionals belong to different organizations, consider having representatives from each.
8. The need for a separate Confirmation Team depends on the complexity or potential controversy surrounding a particular proposed WSS Set change. Generally, extensive changes and those that involve the likelihood of differences of opinion on the resulting adequacy of the WSS Set would benefit from a separate Confirmation Team. If confirmation will be performed by the ID Team, be sure that the team includes people that do not have direct responsibility for the performance of the work.
9. The membership of the ID Teams and Confirmation Teams and the level of the Approval Authorities must be matched to the scope of work impacted by the potential WSS Set revision (e.g., project-wide, site-wide, or impacting multiple sites). Give consideration to current organizational structures and matrixed responsibilities within both DOE and the contractor.

# REQUIREMENTS MANAGERMENTS

DATED: 01/05/2009

Attachment 1

Page 3 of 4

10. Coordinate with other contractors when appropriate.
11. Select Approval Authorities at a level appropriate for the scope of the proposed WSS Set change. It is not necessary for the ORO Manager and the top contractor manager to approve every revision/change. However, the Approval Authorities must be high enough to ensure proper consideration of cross-cutting impacts. The following example was created for informational purposes:

<u>Revision/Change Impact</u>	<u>ORO</u>	<u>Contractor</u>
Site-Wide	Manager or COR	Manager or Director
Division Wide	COR	Division Manager
Program/Experiment	COR	Program Manager

**NOTE:** If the contractor has an approved site-wide or company-wide WSS Set, the WSS Set change effort for a project should focus on developing a project-specific Implementation Assumption to be added to the WSS Set.

12. In summary, an effective change control process should be characterized by the following:
  - The change control process should be a part of the organization's ISMS, as is the N&S Process.
  - The change control process should be implemented at an appropriate point in the N&S Process, typically after approval of the initial WSS Set.
  - The change control process should provide for screening of new inputs (for example, information about new work or changed hazards) to determine the need and appropriate mechanism for further action. Not all changes will require the same degree of attention. Minor administrative changes to existing standards could be issued with little review, while information about a new hazard may require more extensive review to identify appropriate standards.
  - The standards bases described in the documentation of the approved WSS Set should be used as the principal configuration control reference.
  - When changes to the WSS Set are made, the WSS Set documentation should be revised to reflect the changes and the bases for those changes.
  - The change control process should replicate the N&S Process, with roles and responsibilities that correlate to those in the N&S Process, to ensure that changes to the WSS Set are made deliberately and are adequately justified.
  - The change control process should be well-defined, so that potential changes can be handled "routinely," within a framework of defined tasks and responsibilities.

# REQUIREMENTS MANAGERMENTS

**DATED: 01/05/2009**

Attachment 1

Page 4 of 4

- The change control process should be managed by a single organization to ensure consistency and comprehensiveness in addressing potential changes.
- The change control process should be integrated with existing site mechanisms for documenting and promulgating standards so that changes can be communicated to those who use the standards in a timely fashion.
- The change control process should be integrated with existing processes and personnel responsibilities for contract modification.