

U.S. Department of Energy

Oak Ridge Office

ORO O 250 Chapter I Change 5

DATE: 04/18/2006

SUBJECT: ORO STANDARDS MANAGEMENT PROGRAM OVERVIEW

1. PURPOSE. This Chapter correlates to DOE O 251.1A, DIRECTIVES SYSTEM, dated January 30, 1998; DOE O 251.1-1A, DIRECTIVES SYSTEM MANUAL, dated January 30, 1998; and DOE O 252.1, TECHNICAL STANDARDS PROGRAM, dated November 19, 1999; and provides an overview of the Oak Ridge Office (ORO) Standards Management Program. This Chapter assigns responsibilities and accountability and provides administrative guidance to ORO and its contractors. Nothing in this issuance changes any requirements contained in any Department of Energy (DOE) Directive.
2. CANCELLATION. This Chapter cancels and replaces ORO O 250, Chapter I, Change 4, ORO STANDARDS MANAGEMENT PROGRAM OVERVIEW, dated March 10, 2004.
3. APPLICABILITY. The provisions of this Chapter apply to the Federal and site/facility management contractor staffs who perform work related to the ORO contracts with List B requirements (List B) administered by the Directives Management Group (DMG).
4. RESPONSIBILITIES. Refer to the remaining Chapters of this ORO Directive for specific responsibilities related to subjects covered in those Chapters. The following responsibilities apply to all Chapters.
 - a. Principal Staff, including Divisions of Primary Interest (DPIs).
 - (1) Identify employees in their organizations to serve as Subject Matter Experts (SMEs) or operational experts for assigned DOE/ORO Directives, standards, and functional areas.
 - (2) Ensure that Standards Management Program activities are completed in a timely and professional manner.
 - (3) Discuss and resolve any technical disagreements that arise during program activities with others involved in the Standards Management Program.
 - (4) Provide a SME List for all personnel involved in environment, safety, and health (ES&H) standards activities, such as a Standards/Requirements Identification Document (S/RID) change or Work Smart Standards (WSS) Set development or revision efforts, to DMG, as requested

- b. Contracting Officers (COs) issue contract modifications to include, delete, or otherwise change requirements in List B in the contracts via approved Requirements Change Notices.
- c. Contracting Officer's Representatives (CORs) in addition to the responsibilities described in Paragraph 4a above:
 - (1) Identify a designated individual to serve as the primary point of contact on Standards Management Program activities within their organization and notify DMG of the individual's name.
 - (2) Prepare all standards-related documents for which ORO has not been delegated approval authority for submission to DOE Headquarters (HQ) for approval and provide a copy to DMG.
- d. Team Leader, Directives Management Group, provides support to all ORO organizations on the Standards Management Program.
 - (1) Develops administrative guidance and implementing procedures for Standards Management Program activities.
 - (2) Provides briefings, advice, and assistance to SMEs, operational experts, COR-designated individuals, and ORO management on Standards Management Program activities and processes.
 - (3) Serves as the primary coordinator for all Standards Management Program activities between project participants, including the Director of the appropriate DPI, CORs and/or COR-designated individuals, contractors, and DOE HQ personnel.
 - (4) Oversees DMG serving as the Office of Record for ORO's Standards Management Program documents when documents are provided to DMG.
 - (5) Develops processes to evaluate, track, and disseminate contract administration information related to contractor baselines of required compliance documents.
 - (6) Serves as process advisor for development and revision of WSS Sets.
 - (7) Maintains and tracks records of Memoranda of Understanding/Agreements, Mutual Agreements, Delegations of Authority, and Authorization Agreements. Information is available on the DMG Home Page.

5. REQUIREMENTS AND PROCEDURES.

- a. Introduction. ORO is responsible for oversight of programs and facilities directed by DOE HQ program offices. ORO, and its contractors have developed a comprehensive Standards Management Program that addresses the Department's criteria for this type of program (i.e., DOE/EH/-0416, *Criteria for the Department's Standards Program*), key Defense Nuclear Facilities Safety Board issues, and internal ORO management and oversight needs. In

addition, this program fulfills certain core functions of integrated safety management as expressed in DOE P 450.4, SAFETY MANAGEMENT SYSTEM POLICY.

DOE's expectations are expressed through Directives. ORO, and its contractors have an opportunity to review and comment on proposed Directives. ORO, and its contractors also have available two DOE-approved tools to identify appropriate ES&H standards/requirements, (1) the WSS Set and (2) the S/RID and their change process. Approved WSS Sets and S/RIDs are placed in the contract. Contractors also have certain Standards Management Program responsibilities as described in the Contractor Requirements Document of each Chapter of ORO O 250 containing specific contractor requirements. The approach developed and presented in this Directive integrates program requirements from all DOE program offices and existing ORO and contractor Standards Management Programs.

- b. Overview of the ORO Standards Management Program. The process described below provides an overview of the steps ORO, and its contractors follow to identify and implement ES&H and administrative contract requirements.
 - (1) Standards Development. ORO, and its contractors are afforded the opportunity to review and comment on proposed Directives under development by DOE to ensure they are appropriate to control the work and associated hazards and to provide adequate protection of workers, the public, and the environment. The comment process allows both sides to express concerns and obtain clarification before the documents are finalized. ORO, and its contractors are also encouraged to comment or otherwise participate in the development of other standards through appropriate channels.
 - (2) Identification of Contract Requirements.
 - (a) DOE/ORO Directives.
 - 1 Receipt and Distribution of Directives. DOE HQ posts new and revised DOE Directives on the DOE Directives Portal and ORO Directives are posted on the DMG Home Page.

DMG performs the following for DOE/ORO Directives:

 - Routes each DOE/ORO Directive to the DPI to establish their position on applicability of the document to particular contracts.
 - Electronically notifies ORO organizations, COs, and CORs (or their designated contact point) and contractors who have registered on the DMG Home Page of the publication of all final Directives.
 - Prepares correspondence for the COR (or their designated contact point) to request impact assessments of DOE/ORO Directives requirements in the operating contracts.
 - 2 Impact Assessment/List B Requirements. Some ORO contracts contain a Directives clause (Department of Energy Acquisition Regulation [DEAR] 970.5204-2, *Laws, Regulations, and DOE Directives* [DEC 2000]) that

provides for development and maintenance of a List B for certain applicable Directives. Before a new or revised DOE/ORO Directive (or portion thereof) is included in List B, the contractor reviews the Directive and agrees to the applicability of the document under contract terms. If applicable, the contractor determines whether it is currently in compliance with the Directive and what the overall impact on operations might be and, for ES&H Directives, whether a WSS Set revision or S/RID change effort should be initiated. The contractor response is transmitted to ORO within 30 calendar days of the receipt of the COR's letter requesting an impact assessment.

(b) Other Source Documents.

- 1 DOE Technical Standards. Contractors are responsible for obtaining new and revised DOE Technical Standards from the appropriate sources. DMG maintains a link to the DOE Technical Standards Home Page for access to all its documents.
 - 2 Laws and Regulations. Contractors and designated SMEs working in the Federal staff are responsible for obtaining new and revised Federal, State, and local laws and regulations from the appropriate sources.
 - 3 Voluntary Consensus Standards (Optional Industrial Guidelines). Contractors and designated SMEs working in the Federal staff are responsible for obtaining new and revised voluntary consensus standards from the appropriate sources.
- (3) WSS Sets. Contractors may either choose to comply with the requirements in applicable DOE/ORO ES&H Directives or develop WSS Sets that are appropriate to control the work and associated hazards and to provide adequate protection of workers, the public, and the environment.
- (4) S/RIDs. ORO contractors with S/RIDs must follow the DOE-approved S/RID functional area requirements. Emergency Management and Occurrence Reporting Directives **must** be included in a DOE-approved S/RID or in List B by number. Emergency Management and Occurrence Reporting Directives **cannot** be included in a WSS Set.
- (5) Implementation Plans (IPs). As provided by their contract, ORO prime contractors write IPs for new/revised requirements added to List B (e.g., Administrative Directives, WSS Sets, or S/RIDs) where the contractor cannot achieve full compliance within existing funds and/or within specified time limits.
- (6) Corrective Action Plans. Corrective actions associated with ES&H noncompliances found during assessments (internal and external) are handled by the contractor's and COR's issues management process and/or as directed by the COR or DOE HQ. Therefore, this Directive does not cover corrective action plans.
- (7) Requirements Flowdown. After standards/requirements are accepted as appropriate and applicable and placed in the contract, they must be incorporated in the contractor's

implementing documents (such as policies, programs, procedures, and other media) that guide and control actual work processes.

- (8) List B Requirements Posted on the Internet. The DMG Home Page contains links to contractor List B Requirements, S/RIDs, and WSS Sets posted on contractors' home pages.
6. REFERENCES. See each individual Chapter for references that apply only to that particular subject matter. General references include:
 - a. Federal Advisory Committee Act.
 - b. DEAR 970.5204-2, LAWS, REGULATIONS AND DOE DIRECTIVES (DEC 2000).
 - c. DOE P 450.4, SAFETY MANAGEMENT SYSTEM POLICY, dated October 15, 1996.
 - d. DOE/EH/-0416, *Criteria for the Department's Standards Program*, dated August 1999 1994.
 - e. ORO O 250, Revision 8, STANDARDS MANAGEMENT PROGRAM, dated April 18, 2006, ALL CHAPTERS, and any subsequent revisions.
7. DEFINITIONS. See Attachment 2 of this Chapter for a glossary of terms used in the ORO Standards Management Program.
8. CONTRACTOR REQUIREMENTS DOCUMENT. See Attachment 1, Contractor Requirements Document.
9. ATTACHMENTS.
 - a. Attachment 1 - Contractor Requirements Document.
 - b. Attachment 2 - Definitions.

CONTRACTOR REQUIREMENTS DOCUMENT

Types of contractors identified in Paragraph 3 of this Chapter must develop management systems and processes that align with the requirements and procedures contained in Paragraph 5 of this Chapter and comply with the following.

1. Contractors must provide Directives Management Group (DMG) with appropriate names and electronic mail addresses for personnel who should receive notification of the publication of new/revised DOE/ORO Directives. An electronic registration form is available on the DMG Home Page.
2. Contractors are responsible for obtaining new and revised Federal, State, and local laws and regulations; voluntary consensus standards; and Department of Energy (DOE) Technical Standards from appropriate sources. Links to related web sites are available on the DMG Home Page.
3. Contractors must flow down requirements by incorporating standards/requirements accepted as applicable to their contract into their implementing documents (such as policies, programs, implementing mechanisms [i.e., procedures, posters, etc.], and other media).

DEFINITIONS

These definitions apply specifically to the Oak Ridge Office (ORO) Standards Management Program and may not be identical to the definitions for the same terms used in other ORO documents.

1. **ADEQUACY.** Adequacy of standards/requirements is achieved when a set of Environment, Safety and Health (ES&H)-related standards/requirements selected to control the work and associated hazards for specific sites, facilities, or activities has been approved by Department of Energy (DOE) as providing an acceptable level of protection equivalent to comparable commercial facilities/activities. If there are no comparable commercial facilities, adequacy is what is determined to be acceptable by DOE, normally through the Standards/Requirements Identification Document (S/RID) and Work Smart Standards (WSS) Set development and revision/change process.
2. **APPLICABILITY.** Whether a standard or requirement addresses the work performed at a site or facility or by a contractor. The applicability decision does not include cost/benefit analysis or a judgment of the reasonableness of implementing the standard or requirement.
3. **ATTACHMENT.** An essential document that needs to be included as part of the Directive to effectively implement the requirements of that Directive.
4. **AUTHORIZATION AGREEMENTS.** Documented agreements between DOE and the contractor that define the authorization basis for a defined scope of work.
5. **COMPENSATORY MEASURES.** Necessary interim actions taken to reduce the risk to the health and safety of the public, workers, or the environment to an acceptable level (i.e., the likelihood of killing, maiming, injuring, or exposing the public or workers to hazardous materials is very small over the remaining life of the facility) until actions can be taken to mitigate or eliminate the noncompliance and/or risk (i.e., provide a level of protection equal to that provided by the requirement or come into full compliance with the requirement).
6. **CONFIRMATION TEAM.** The Confirmation Team is responsible for verifying that the Identification (ID) Team followed the WSS process and for confirming the adequacy of the proposed WSS Set.
7. **CONVENED GROUP.** The Convened Group (or equivalent) is composed of appropriate line, ES&H, and senior management personnel from the contractor and ORO, plus others determined by this group to be appropriate. The Convened Group acts as the “agreement parties” for the initial WSS development process. The Convened Group for a new WSS Set development effort is determined by the Contracting Officer’s Representative (COR), and a senior member of the Office of Assistant Manager for Environment, Safety, and Health (Division Director or above). If the scope of the WSS Set warrants it (e.g., a site-wide WSS Set with multiple work scopes and hazards), the Convened Group may choose to split itself into an Executive Convened Group (ECG) and one or more lower level Technical Convened Group(s) (TCGs).
 - **Executive Convened Group.** A team group to which certain Convened Group responsibilities are delegated. The ECG normally consists of senior-level ORO and contractor management and DOE Headquarters (HQ) personnel.

- **Technical Convened Group.** One or more lower-team group(s) to which certain Convened Group responsibilities are delegated. The TCG must meet with the ECG on a regular basis to report progress, obtain agreement on proposed actions, etc.
8. **DELEGATIONS OF AUTHORITY.** Delegations of Authority to DOE from other Federal agencies.
 9. **DOE DIRECTIVES.** Official communications of policies, requirements and procedures. Directives are used to inform, direct, and guide employees in the performance of their work and to enable employees to work effectively within the Department and with other Government agencies, contractors, and the public. Directive include Policies, Orders, Notices, Manuals, and Guides.
 10. **DIVISION OF PRIMARY INTEREST.** The organization, typically at the division level, that has principal responsibility for the subject matter of a particular DOE/ORO Directive. This organization originates ORO Directives related to the DOE Directive of that subject.
 11. **EXECUTIVE CONVENEED GROUP.** See Convened Group.
 12. **EXEMPTION.** An exemption is a formally requested and approved relief, waiver, or release (either temporary or permanent) from a DOE/ORO Directive requirement.
 13. **FUNCTIONAL AREA.** A major program area that is applicable to DOE operations. Examples of ES&H functional areas include Fire Protection, Radiation Protection, Environmental Protection, etc.
 14. **IDENTIFICATION (ID) TEAM.** The ID Team is responsible for the WSS Set development and maintenance. The quality of a WSS Set document depends on the quality of the ID Team. The ID Team must include an appropriate mix of experienced personnel who are team players and knowledgeable in the subject matter, site, facility, or activity. The ID Team should include (1) contractor line managers, Subject Matter Experts (SMEs), and workers and (2) ORO line managers and SMEs. The ID Team may include other DOE personnel (e.g., DOE HQ program office personnel).
 15. **IMPLEMENTATION ASSUMPTION.** A statement within a WSS Set or S/RID that documents how a standard or requirement is applied for the specific site or facility or by a contractor. An assumption may define applicability, clarify the intent of the requirement, provide cross-references, or define basic assumptions used in applying the requirement. DOE approves implementation assumptions during the adequacy review and approval process. Changes to the assumptions must also be approved by DOE.
 16. **IMPLEMENTATION GUIDANCE.** Is not a requirement but is suggested guidance for implementing WSS Sets or S/RIDs.
 17. **IMPLEMENTATION PLANS.** Specify actions and schedules for achieving compliance with new/revised contract requirements and provide appropriate information to support the proposed actions. Implementation plans cover new and revised requirements which the contractor is unable to implement within existing funds and/or specified time frames.

18. **IMPLEMENTING DOCUMENTS.** Implementing documents include, but are not limited to, policies, procedures, engineering drawings, training materials, job postings, education/qualification documents, permits, and Safety Analysis Reports that specify the actions and conditions necessary to operate in accordance with applicable requirements.
19. **MEMORANDUM OF AGREEMENT.** Serves the same purpose as an Memorandum of Understanding (MOU), and has the same legal and financial restrictions. It differs from an MOU in that it is an agreement used between DOE Organizations (including those between ORO entities).
20. **MEMORANDUM OF UNDERSTANDING.** A written agreement between ORO and a non-DOE organization. It describes the understanding between the parties for tasks to be performed and a method for their performance. An MOU is not a binding contract, and it cannot be used to obligate or commit funds or serve as the basis for the transfer of funds.
21. **OPERATIONAL EXPERT.** Personnel knowledgeable of site/facility activities, processes, programs, policies, and procedures (e.g., Facility Representative, Facility Manager, etc.).
22. **ORO DELEGATIONS.** Legal documents used by the Manager, ORO, to delegate authority to an Assistant Manager, who, if it is found necessary and feasible, can then in turn delegate the authority to the Director, Procurement and Contracts Division, for contractual work at the Field level.
23. **ORO DIRECTIVES.** Supplemental directives that assign and establish requirements, responsibilities and procedures at the field level. They may correlate to a DOE Directive or cover other topics. ORO Directives consist of Orders, Chapters, Manuals, Notices and Guides.
24. **PRINCIPAL STAFF.** All direct reports to the Manager and Division directors.
25. **PROCESS LEADER.** The WSS Set process leader must be responsible for coordinating WSS Set development.
26. **REQUIREMENT.** A specific sentence, paragraph, or section within a source document that prescribes explicit actions, responsibilities, or criteria that must be met because of either legal or contractual obligations. References included in a reference section are not considered to be requirements, nor are broad and general policy statements. Contractual requirements do not become binding upon contractors until placed in List B. However, applicable requirements from Federal, State, and local laws and regulations are binding even if they are not mentioned in the contract.
27. **SECRETARIAL DELEGATIONS OF AUTHORITY.** The highest level legal instrument used to transfer authority granted to the Secretary of Energy by statute, Executive Order, or regulation to an Assistant Secretary or Head of a Departmental or Field Element.
28. **SOURCE DOCUMENT.** The standard in which a requirement originates, such as DOE/ORO Directives, DOE Technical Standards, DOE Rules, laws, regulations, or voluntary consensus standards. An organization's internal policies and procedures are implementing documents, not sources of requirements.
29. **STAKEHOLDERS.** Stakeholders may include regulators from DOE, State, local, and other Federal agencies; unions representing workers; other organizations that rely on the work products or

services; and the public, including individuals and elected and appointed public representatives.

The Convened Group determines the appropriate Stakeholders for each application and the appropriate degree of Stakeholder involvement. The degree of participation may include:

- Notification and opportunity to comment on the proposed WSS Set,
- Observation of the process as carried out by the ID Team, or Recommendations made directly to one or more of the various teams.

Individuals who are not Federal, contractor, or subcontractor employees or who are not under contract to DOE or a DOE contractor may not serve on the stakeholder teams unless the provisions of the Federal Advisory Committee Act are invoked.

30. **STANDARD.** Standards are the expressed expectations for performance of work. Standards may be reference points against which to measure excellence or they can become enforceable requirements (either under law or under DOE contract). An organization's internal policies and procedures are implementing documents, not standards. Standards are also referred to as source documents. Standards include Federal, State, and local laws and regulations; DOE/ORO Directives; and voluntary consensus standards that protect the environment, the safety and health of workers, and the public.
31. **STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT.** An S/RID lists the necessary and sufficient set of ES&H-related requirements to be implemented by a site, facility, activity, or contractor to achieve an adequate level of protection of worker(s), the public safety and health, and the environment. S/RID requirements are structured by functional area.
32. **SUBJECT MATTER EXPERT.** An individual with experience and education or training in a particular functional area, sufficient to serve as a technical advisor on matters relating to that functional area. SMEs may serve as assessors, prepare and/or review corrective action plans and implementation plans, help develop or review WSS Sets, and review S/RID change packages.
33. **TAILORED APPROACH.** A method of implementing a requirement to the extent appropriate and necessary based upon the specific mission, activities, and hazards at a site or facility.
34. **TECHNICAL CONVENED GROUP.** See Convened Group.
35. **VOLUNTARY CONSENSUS STANDARDS.** A prescribed set of rules, conditions, or best management practices developed or adopted by a voluntary consensus standard body, both domestic and international (e.g., American Society of Mechanical Engineers, American Nuclear Society).
36. **WORK SMART STANDARDS SETS.** WSS Sets are the necessary and sufficient set of requirements to meet performance expectations and objectives for providing adequate protection to workers, the public, and the environment. The process of developing the WSS Set includes:
 - (1) Defining the work and associated hazards,
 - (2) Creating the teams,

- (3) Defining the protocols and documentation requirements,
- (4) Identifying the set of standards/requirements,
- (5) Confirming the WSS Set, if necessary, and
- (6) Approving the WSS Set.

Approved WSS Sets are placed in the contract by contract modification.

37. **WSS SET TEAM PARTICIPANTS.** See Confirmation Team, Convened Group (Technical and Executive), ID Team, and Process Leader.