

ORO CONTROL FORM - FINAL DIRECTIVE

PART A (To be completed by the Division of Primary Interest (DPI))

1. **NUMBER AND TITLE OF DIRECTIVE:** **ORO O 250, Chapter V, Change 5, DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART STANDARDS SETS**

2. **PURPOSE OF TRANSMITTAL:** New Directive Revised Directive

3. **THIS DOCUMENT MAY AFFECT THE WORK PERFORMED BY THE FOLLOWING CONTRACTORS:** (Check appropriate boxes)

No (all contractors)

Yes If yes, whom? Bechtel Jacobs Co. ORAU UT-Battelle

Other contractors (list by type) Bechtel Jacobs Co. (Portsmouth/Paducah GDPs ONLY); BNFL Inc.; East Tennessee Materials and Energy Corporation; and Wackenhut Services Inc.

Many ORO contractors have approved Work Smart Standards (WSS) Sets or Standards/Requirements Identification Documents (S/RIDs) that may affect applicability of contractor requirements from this Directive. Applicability of contractor requirements must take into account the approved standards set for each particular contract.

4. **SIGNIFICANT PROVISIONS:** Are there any significant changes or impacts? No Yes
If yes, describe: This Chapter has been updated to add notation that Category 1 and Category 2 references apply only to DOE HQ NE-owned nuclear facilities.

5. **CONTACT POINT:** Wayne H. Albaugh Directives Management Group, AD-440 576-0974
Name Organization Telephone

PART B (To be completed by the Directives Management Group (DMG)):

6. **FILING INSTRUCTIONS:**

<u>Remove</u>	<u>Dated</u>	<u>Insert</u>	<u>Dated</u>
ORO Control Form	10/31/2003	ORO Control Form	12/03/2003
ORO O 250, Ch. V, Chg. 4	10/31/2003	ORO O 250, Ch. V, Chg. 5	12/03/2003

ORO Directives are available on the ORO Directives Management Home Page at http://www.ornl.gov/doe/doe_oro_dmg/oro_dir.htm. The ORO Directives will no longer be mailed in printed copy unless you do not have Internet capabilities.

7. **APPROVED FOR DISTRIBUTION IN ACCORDANCE WITH THE OFFICIAL DIRECTIVES DISTRIBUTION LIST:**

Original Signed By
Wayne H. Albaugh 12/03/2003
Signature: DMG Team Leader, AD-440 Date

INSTRUCTIONS TO ADDRESSEES: THIS FORM IS TO BE FILED WITH THE DIRECTIVE AND RETAINED

Rev. 10/31/2003

NNSA/YSO CONTROL FORM – FINAL DIRECTIVE

PART A (To be completed by the ORO DIRECTIVES MANAGEMENT GROUP, AD-440):

DIRECTIVE NUMBER, TITLE, AND DATE:

ORO O 250, CHAPTER V, CHANGE 5, DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART STANDARDS SETS, dated 12/03/2003

PURPOSE OF TRANSMITTAL: New Directive Revised Directive

DOES THIS DIRECTIVE CANCEL/REPLACE OR EXTEND ANY OTHER DIRECTIVES? Yes No
If "Yes," list what action (cancel/replace or extend) and list the Directive(s), including the number(s), title(s), and date(s):

This Directive cancels ORO O 250, Chapter V, Change 4, DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART STANDARDS SETS, dated 10/31/2003

The attached Directive is forwarded for review and action. Complete Part B and forward this form to ORO DMG, AD-440, by 12/19/2003.

PART B (To be completed by the NNSA Y-12 SITE OFFICE, Y12-01):

CONTRACTOR APPLICABILITY:

Does this Directive affect the work performed by BWXT Y-12, L.L.C.? Yes No

Does this Directive affect the work performed by BWXT Y-12, L.L.C., subcontractors? Yes No

If "Yes," list the subcontractors:

Many contractors have approved Standards/Requirements Identification Documents (S/RID) or Work Smart Standards (WSS) Sets that may affect applicability of contractor requirements from this Directive. Applicability of contractor requirements must take into account the approved standards set for each particular contract.

SIGNIFICANT PROVISIONS: Are there any significant changes or impacts? Yes No

List summary of Directive changes and, if "Yes" above, describe the significant changes or impacts:

IMPLEMENTATION: Does the Directive contain special implementation requirements and/or dates? Yes No

If "Yes," describe:

FOR DOE DIRECTIVE – SUPPLEMENTAL DIRECTIVE REQUIRED?

Is a new or revised supplemental Directive required? Yes No

If "Yes," target date for submission of YSO Directive is _____.

IDENTIFY CONTACT POINT: Diane McCarten 576-9330
Name Telephone

APPROVED BY COR FOR DIRECTIVES: Diane McCarten 12/10/2003 576-9330
Signature Date Telephone

PART C (To be completed by the ORO DIRECTIVES MANAGEMENT GROUP, AD-440):

DOE Directives are available on the DOE Directives Portal at <http://www.directives.doe.gov/>. ORO Directives are available on the ORO Directives Management Group Home Page at http://www.ornl.gov/doe/doe_oro_dmg/oro_dir.htm. Directives will no longer be mailed in printed copy unless you do not have Internet capabilities.

APPROVED FOR DISTRIBUTION IN ACCORDANCE WITH OFFICIAL DIRECTIVE DISTRIBUTION LIST:

Original Signed By
Wayne H. Albaugh, AD-440 12/17/2003
Name Date

INSTRUCTIONS TO ADDRESSEES: THIS FORM IS TO BE FILED WITH THE DIRECTIVE AND RETAINED.

(Revised 11/06/2003)

U.S. Department of Energy

Oak Ridge Operations

ORO O 250 Chapter V Change 5

DATE: 12/03/2003

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

1. PURPOSE. This Chapter 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. It assigns responsibility and accountability and provides administrative and/or contractual guidance to Oak Ridge Operations (ORO), National Nuclear Security Administration (NNSA) Y-12 Site Office (YSO), and their prime contractors that choose to develop Work Smart Standards (WSS) Sets. 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 V, Change 4, DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART STANDARDS SETS, dated October 31, 2003.
3. APPLICABILITY. The provisions of this Chapter apply to the Federal and site/facility management contractor staffs who perform work related to the four prime contracts with List B requirements (List B) administered by the Directives Management Group (DMG). Contractors who choose to develop WSS Sets must adhere to the process described in DOE M 450.3-1, and to the requirements and procedures in this Chapter. The NNSA YSO will determine the applicability of this ORO Directive to their programs. This ORO Directive does not assign responsibility or authority for the YSO staff.
4. RESPONSIBILITIES.
 - a. Manager. If requested by the Convened Group, approves WSS Sets for initial applications and revisions.
 - 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 is ultimately responsible for safety as defined in the integrated Safety Management System Principles #1 (Line Management is Responsible for Safety) and

#5 (Identification of Safety Standards and Requirements). As such, the COR is responsible for the planning, development, and/or contract revision stages of the WSS process (see DOE P 450.3). Copies of all background materials must be provided to DMG for official files.

- (2) The COR determines DPI involvement and provides information, as the COR deems appropriate, to the DPI.
 - (3) When appropriate, approves WSS Set revisions. See ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES, regarding updating/adding S/RID requirements on the contract(s).
- e. Convened Group, Process Leader, Identification Team, Confirmation Team, and Stakeholders are designated positions used exclusively in the WSS process. For definitions and responsibilities, see Attachment 4.
- f. Team Leader, Directives Management Group.
- (1) Provides advice and assistance to ORO staff and contractors on subjects covered in this Chapter.
 - (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.
 - (4) On request from the COR, incorporates approved WSS Sets or revisions thereto into the contract via a contract modification signed by the Contracting Officer which includes a Requirements Change Notice (RCN) and posts this information on the DMG Home Page.
 - (5) Maintains the official WSS files for information and historical purposes, if provided by the CORs or their staff.

5. REQUIREMENTS AND PROCEDURES.

- a. Introduction. Identification of appropriate standards is an essential part of the Standards Management Program. For environment, safety, and health (ES&H) standards/requirements, the following processes are available:
- Comply with all applicable DOE/ORO ES&H Directives in List B by number and/or reference in the WSS Set or S/RID,
 - Maintain a DOE-approved S/RID, and/or
 - Develop and maintain one or more DOE-approved WSS Sets (formerly referred to as the Necessary and Sufficient Process).

A WSS Set contains the ES&H standards that are necessary and sufficient to provide an adequate level of protection to workers, the public, and the environment for the identified scope of work. WSS Sets automatically include all applicable Federal, State, and local laws and regulations from which DOE is not exempt. In addition, the WSS Set includes other standards (or portions thereof) selected to ensure that adequate ES&H protection is provided. These standards may be chosen from a variety of sources, including national consensus standards, DOE Directives, and DOE Headquarters (HQ) program direction documents. DOE's Department Standard Committee Work Smart Standards Web Site (<http://tis.eh.doe.gov/dsc/index.html>) has information on the WSS Set Process and sources of standards used in WSS Sets. Additionally the DMG Home Page (http://www.ornl.gov/doe/doe_oro_dmg/) link titled "*Links to Other Information Resources*" is a web page with links to sources of standards used in WSS Sets within ORO.

WSS Sets are nontransferable. WSS Sets are developed and approved for a specific scope of work that is clearly identified in the Final Report for the WSS Set. While it is acceptable for an Identification (ID) team to use an existing WSS Set as the starting point for its analyses and deliberations, a WSS Set approved for one scope of work must not be blindly copied for another scope of work, even if the second scope of work looks rather similar to the first. The full WSS process must be applied to developing the WSS Set for the second scope of work.

b. WSS Development.

(1) Follow DOE M 450.3-1, THE DEPARTMENT OF ENERGY CLOSURE PROCESS FOR NECESSARY AND SUFFICIENT SETS OF STANDARDS, to develop an adequate WSS Set. Additionally, refer to DOE G 450.3-1, DOCUMENTATION FOR WORK SMART STANDARDS APPLICATIONS: CHARACTERISTICS AND CONSIDERATIONS; and DOE-HDBK-1148-2002, WORK SMART STANDARDS USERS HANDBOOK, as supplemental guidance.

(2) Minority Reports and Differences of Opinion.

- (a) ID and Confirmation Teams are expected to engage in full and frank discussion of differences of opinion and strive to reach consensus on all issues. However, if a team is unable to reach consensus even after lengthy discussion, then majority rule or another decision-making process may be used instead. In this case, individual team members may submit a Minority Report if they believe the team's recommendation does not provide adequate ES&H protection or imposes standards that are disproportionate to the known hazards. The team forwards unresolved Minority Reports and accompanying team recommendations to the next level (e.g., Confirmation Team or Approval Authorities), or it follows the protocol for issue resolution that was established by the Convened Group.
- (b) During the WSS development process, Stakeholders, subject matter experts (SMEs), and other interested parties who are not members of the ID Team, Confirmation Team, or Convened Group may review the proposed WSS Set and have concerns and issues. If one of these reviewers believes that the proposed WSS Set or revision thereto would not provide adequate ES&H protection, that person may write up the issue as a "Difference of Opinion" and take it to the Process Leader for referral to the Confirmation Team or Approval Authorities. If the person is a DOE or

contractor employee, the difference of opinion should be copied to his/her management chain at the same time that it is submitted to the Process Leader.

- (3) Opportunity to Comment. The Process Leader may elect to conduct one or more open forums that provide opportunity to solicit input from the other affected personnel in the contractor's organization and ORO on the content of the proposed WSS Set. The Process Leader schedules the comment session and reserves an appropriate meeting space. When possible, the Process Leader, ID Team members, and the COR coordinate distribution of the proposed WSS Set to the appropriate attendees a week in advance of the scheduled comment session. The Process Leader and ID Team attend the comment session to respond to questions from the attendees. The ID Team documents and resolves issues raised at the comment session, and the Process Leader distributes the resolution to everyone who signed in at the comment session.
- (4) Final Report. Each WSS Set referred for approval must be part of or accompanied by a Final Report that documents the process used and justifies the adequacy of the WSS Set. The Process Leader is responsible for developing this report, although sections of it may be prepared by the Convened Group, the ID team, or the Confirmation Team, as described below. The report should be as concise as possible, and no format is prescribed. These previously approved Final Reports may be of use as examples for new ID Teams to follow when writing their Final Report. As a minimum, the Final Report must include the following information:
 - (a) A description of the scope and coverage of the WSS Set, including a description of the organization, site, and facilities covered; and the scope of the hazards or program areas addressed by the WSS Set. Include a list of any pertinent "out of scope" safety management system areas, hazards, or activities that are not included in the WSS Set, such as occurrence reporting, emergency management, fire protection operations, etc. Address the relationship and interfaces between the WSS Set and other standards sets that may have an impact on the site, such as the DOE/ORO Directives listed on List B or the requirements contained in an S/RID. (See ORO O 250, Chapter IV, IMPACT ASSESSMENTS, and ORO O 250, Chapter VII, MAINTENANCE OF STANDARD/REQUIREMENTS IDENTIFICATION DOCUMENTS, of this Directive.)
 - (b) A summary description of the work and the hazards, including appropriate references to existing documents where more complete information may be found. Include a description of the process used for determining the work and hazards.
 - (c) Instructions from the Convened Group, including any technical and management expectations and private industry benchmarks.
 - (d) A description of the structure of the WSS Set, including information on what the various elements are and how they interface with each other and with other areas related to integrated safety management.
 - (e) A statement that the most current versions of compliance agreements, regulatory enforcement actions, Safety Analysis Reports, Bases for Interim Operations, technical safety requirements, Authorization Agreements, permits, and procedures

will be reviewed for consistency with the standards contained in the WSS Set, and these will control in the event of conflict until such time as any necessary modifications have been made through appropriate channels.

- (f) A description of the degree and extent of Stakeholder involvement, and reports of any public meetings or other Stakeholder meetings held during the project.
 - (g) A description of the degree and extent of worker involvement.
 - (h) Reasons why the ID Team believes the WSS Set to be adequate and feasible to implement, including a discussion of the process used and how any established expectations and benchmarks are met.
 - (i) The identity and qualifications of the Convened Group, ID Team, and Confirmation Team. One method that has been successfully used to meet this requirement is to provide separate tables for the Convened Group and each team. Each table would list the team member's name, affiliation (contractor or DOE), title, subject area for input to the WSS process, and a short professional biographical sketch.
 - (j) The Confirmation Team report and recommendations, if a separate Confirmation Team is used.
 - (k) Unresolved Minority Reports from ID Team and Confirmation Team members.
- (5) Content of the WSS Set. The WSS Set must be included within or be accompanied by the Final Report. The WSS Set must include the following information in addition to the material required in the Final Report:
- (a) Standards sorted by the chosen structure (i.e, applicable Federal, State, and local laws and regulations, including DOE Rules) and clearly identified by the full number, title, and, where appropriate, version number with date. If individual sections or requirements from a standard are included rather than the whole standard, complete references to sources must be provided (e.g., number, title, section, paragraph, or text).

NOTE: A useful technique that increases the usability of the WSS Set has been to include a table with the standards sorted by/matched to the hazards and a list of standards according to type (e.g., Federal regulations, State regulations, DOE Directives, and consensus standards).
 - (b) A clear statement of whether or not the most current versions of consensus standards listed in the WSS Set are to be used (versus the versions identified when the WSS Set was approved).
 - (c) A clear statement of whether or not standards incorporated by reference in consensus standards or DOE/ORO Directives listed in the WSS are to be performed to the referenced version or to the most current version.

- (d) A clear statement of whether or not the most current versions of DOE/ORO Directives listed in the WSS are to be used (versus the versions identified when the WSS Set was approved).
 - (e) Applicability information. For each standard, define applicability within the contractor's organization to the extent practicable.
 - (f) Implementation Assumptions (IAs), where used.
 - (g) A statement that applicable Federal, State, and local laws are considered to be part of the WSS Set even if inadvertently omitted from the WSS list.
- (6) WSS Approval Process.
- (a) General. The Convened Group or the COR, if a Confirmation Team is used, determines the Approval Authorities for initial WSS Sets. Thus far, senior contract management and the ORO Manager have approved initial WSS Sets and some revisions. However, approval authority has not been delegated to ORO for DOE HQ Office Of Nuclear Energy, Science And Technology (NE)-owned Category 1 and Category 2 Nuclear Facilities. The Approval Authorities should be scaled up or down as warranted by the scope and complexity of the proposed WSS Set and the desires of the DOE HQ program offices and/or the ORO Manager.

Based on the recommendation of the ID Team or, if used, the Confirmation Team, the approval authorities:

- Approve the WSS Set as proposed;
- Disapprove the WSS Set and direct the ID Team to make identified changes before the WSS Set can be approved.

- (b) Contractor Approval. Contractor approval is a sign of endorsement of the content of the WSS Set and commitment to implement the standards contained therein. If a confirmation review was performed, contractor senior management approves the WSS Set after the Confirmation Team's review and recommendation for approval.
- (c) DOE Approval. The ORO Approval Authority designated by the Convened Group or the COR, if a Confirmation Team is used, approves initial WSS documents. DOE approval is a sign of endorsement of the content of the WSS Set and commitment to evaluate contractor performance against that WSS Set.

Approval of a WSS Set or changes thereto does not mean an associated exemption request from a Federal, State, or local law or regulation is approved. Approval processes for exemptions to laws and regulations are defined in the individual law or regulation. Furthermore, approval of a WSS Set and placement of the WSS Set in the contract does not constitute implementation. Refer to Paragraph 5c(5) for more information on WSS Set implementation.

- (d) Contract Revision. After a WSS Set or revision thereto is approved, it must be formally placed in the contract. Notification that the contract change will be made is included in the WSS Set approval letter, after which the WSS Set or revision is listed on List B at the next scheduled execution of a contract modification which includes an RCN (normally quarterly). See ORO O 250, Chapter IV, IMPACT ASSESSMENTS, and ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES.
- c. WSS Set Maintenance. See Attachment 2, this Chapter.

- (1) General. WSS Sets are living documents and must be kept up-to-date to reflect current scope of work, hazards, missions, and expectations. Once an initial WSS Set is approved, it may need revision in response to a number of conditions.

Some of the changes will be significant and extensive; and others will be minor and narrowly focused. The change process is designed to provide positive document control and graduated review of changes depending on their complexity.

Either ORO or a contractor may identify the need for a change to a WSS Set. The person desiring a change should contact the appropriate compliance or management systems organization (for the contractor) or the COR (for ORO) for assistance in identifying the appropriate personnel to be involved in a preliminary discussion of whether the change is necessary.

- (2) Submission of Updates. All WSS changes shall have a revision number in order to properly track and control the changes.
- (a) WSS revisions may be proposed at any time.
- (b) Contractors must provide up-to-date hard copies of WSS Sets in a timely manner on request from ORO or DOE HQ.
- (3) Change Control Processes. The change control process for WSS Sets is designed to permit a streamlined process with limited evaluation for simple changes, while using an evaluation similar to that used to establish the original WSS Set for more complex changes. While ORO may identify needed changes, it is the contractor's responsibility to make the changes. For ease in determining the appropriate level of process formality the contractor must provide, **for all proposed changes**, an e-mail or formal correspondence to the COR, COR designee, and DMG that contains the following information:
- Description of magnitude and complexity of proposed change.
 - Justification of proposed change.
 - Schedule for completion of proposed change.
 - Lead point of contact for contractor efforts.

- (4) ORO Review and Response. The ORO process is managed as follows:
- (a) The contractor formally transmits the WSS change package to the COR with a copy to DMG. The COR indicates approval or rejection by the formal correspondence associated with the change package or the Comment/Concurrence Form (see Attachment 3). The concurrence signature line on formal correspondence should always include the date of approval. The COR determines if the DPI should be informed and, if so, forwards a copy of the change package to the DPI.
 - (b) If the COR determines (or the DPI requests) that additional time is needed to ensure a complete understanding of the impact of the proposed changes, the COR notifies the contractor in writing that the 30-day clock (which begins when the change package is received by DMG) has been stopped. The COR provides a copy of the letter to DMG, and, if necessary, the DPI.

If the WSS Set revision affects a NE-Owned Category 1 Nuclear Facility (e.g., High Flux Isotope Reactor [HFIR]) or a NE-Owned Category 2 Nuclear Facility (e.g., Radiochemical Engineering Development Center [REDC]), then approval must be obtained from DOE HQ. The time line (e.g., the 30-day clock) is not applicable if DOE HQ approval is required. The COR must obtain a “target date” for HQ approval and provide it to DMG for tracking purposes.
 - (c) If the reviewers agree that the intended changes are acceptable and do not raise questions concerning the adequacy of the WSS Set, the COR and, if necessary, the DPI return their completed, signed Comment/Concurrence Forms to DMG by the date requested or the COR concurs on the formal contractor transmittal correspondence and provides a copy to DMG. If the COR and DPI cannot agree on ORO’s response to the contractor, either party can ask DMG to facilitate a meeting to work out their differences.
 - (d) If the reviewers disagree with some or all of the proposed changes, the COR provides formal notification to the contractor stating which portions of the proposal are accepted and which portions are rejected.
- (5) Making the Change. The contractor makes the change by updating the master WSS Set and issuing a change notice (hard copy or e-mail) to affected contractor organizations, the COR, and DMG. The contractor should send notification when the WSS Set is approved and updated; however, the contractor may elect to wait until the contract revision is made (i.e., via a contract modification which includes an RCN). See ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES.
- (a) Following approval by both parties, the Process Leader provides a copy of the approved WSS Set or revision and associated documentation to the COR with a copy to DMG. This includes the Final Report, any Differences of Opinion considered by the Confirmation Team or Approval Authorities, meeting notes, written or e-mail input from SMEs, qualification data for the ID Team (and Confirmation Team, if used), etc.
 - (b) On request from the COR, DMG incorporates approved WSS Sets or revisions thereto into the contract via a contract modification which includes an RCN (see ORO O 250,

Chapter VIII, REQUIREMENTS CHANGE NOTICES) and posts this information on the DMG Home Page.

- (c) After a WSS Set or revision is placed in the contract via a contract modification which includes an RCN, it is the list of contractually enforceable ES&H standards/requirements. WSS standards/requirements must be flowed down into contractor work control documents (e.g., programs, plans, procedures, documented work practices, etc.). Contractors must review their existing work control documents to determine if revisions are needed to comply with the WSS Set. Contractors are expected to maintain up-to-date information on the flowdown of the standards/requirements contained in the WSS Set into the work control documents. Contractors initiate implementation of unimplemented WSS standards or portions thereof after their contracts organization receives a letter from the COR approving placement of the WSS Set into the contract.

Planning for implementation of new or revised standards/requirements is handled in accordance with ORO O 250, Chapter VI, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS, and ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES, of this Directive.

- d. WSS Sets on the Internet. The DMG Home Page contains links to WSS Sets that are posted on contractors' home pages. On the DMG Home Page (http://www.ornl.gov/doe/doe_oro_dmg/) click the "*Work Smart Standards (WSS) Sets*" link.

6. REFERENCES.

- a. DOE G 450.3-1, DOCUMENTATION FOR WORK SMART STANDARDS APPLICATIONS: CHARACTERISTICS AND CONSIDERATIONS, dated February 1, 1997.
- b. DOE-HDBK-1148-2002, WORK SMART STANDARDS USERS HANDBOOK, dated February 1, 2002
- c. ORO O 250, Chapter I, Change 3, ORO STANDARDS MANAGEMENT PROGRAM OVERVIEW, dated October 31, 2003, and any subsequent revisions.
- d. ORO O 250, Chapter II, Change 4, ORO DIRECTIVES SYSTEM, dated October 31, 2003, and any subsequent revisions.
- e. ORO O 250, Chapter III, Change 3, ORO TECHNICAL STANDARDS PROGRAM, dated October 31, 2003, and any subsequent revisions.
- f. ORO O 250, Chapter IV, Change 3, IMPACT ASSESSMENTS, dated October 31, 2003, and any subsequent revisions.
- g. ORO O 250, Chapter VI, Change 3, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS, dated October 31, 2003, and any subsequent revisions.
- h. ORO O 250, Chapter VII, Change 3, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, dated October 31, 2003, and any subsequent revisions.

- i. ORO O 250, Chapter VIII, Change 1, REQUIREMENTS CHANGE NOTICES, dated October 31, 2003, and any subsequent revisions.
 - j. ORO O 250, Chapter X, DOE DIRECTIVES SYSTEM, dated October 31, 2003, and any subsequent revisions.
 - k. ORO O 250, Chapter XI, DELEGATIONS OF AUTHORITY, MEMORANDUMS OF UNDERSTANDING, AND AUTHORIZATION AGREEMENTS, dated October 31, 2003, and any subsequent revisions.
7. DEFINITIONS. See Attachment 4. Also see Attachment 2 of ORO O 250, Chapter I, OAK RIDGE OPERATIONS (ORO) STANDARDS MANAGEMENT PROGRAM OVERVIEW, for additional 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 – Guidance for Maintaining the Work Smart Standards Set
 - c. Attachment 3 – Comment/Concurrence Form Work Smart Standards Revision.
 - d. Attachment 4 – Definitions

CONTRACTOR REQUIREMENTS DOCUMENT

Contractors that develop and maintain WSS Sets must comply with Paragraph 5 of this Chapter and the following:

1. Ensure that the WSS Sets and their development/maintenance process meet the requirements of DOE M 450.3-1.
2. Appoint a central point of contact for processing WSS Set changes and notify DMG of that person/organization.
3. Immediately upon approval of the WSS Set (but no longer than 30 calendar days) initiate a flowdown of standards/requirements contained in the WSS Sets into contractor procedures, plans, programs, and documented practices (i.e., Flowdown can begin prior to the issuance of a contract modification.).
4. Contractors must post their approved WSS Sets on their Internet home page and must maintain those electronic sets in up-to-date condition and provide access to DOE within 15 working days of any approved changes and notify DMG that the change has been completed.
5. Register on the DOE Directives Portal (<http://www.directives.doe.gov/>), “E-Mail Notifications, Sign Up” link, and the DMG Home Page (http://www.ornl.gov/doe/doe_oro_dmg/), “Register for E-Mail Notifications on Directives” link, to receive notification of new and revised DOE/ORO Directives.
6. If the contractor’s impact assessment (see ORO O 250, Chapter IV, IMPACT ASSESSMENTS.) states that a WSS revision effort is needed, the WSS change package is due to the COR, with a copy to DMG, within 90 calendar days from the date the COR requests an impact assessment. If additional time is needed, the COR must approve the schedule in advance.
7. If an implementation plan is necessary, see ORO O 250, Chapter VI, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS.

GUIDANCE FOR MAINTAINING THE WORK SMART STANDARDS 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 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 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 the N&S Manual 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

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 documentation should be revised to reflect the changes and the bases for those changes. This is of significant importance for maintaining the WSS Set. At the same time, a WSS 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. ID Teams and Confirmation Teams always require input from contractor, line, workers, and 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 ORO ES&H professionals belong to different organizations (e.g., Site Office and Assistant Manager for Environment, Safety, Health and Emergency Management), 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 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 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.

10. Coordinate with other contractors when appropriate. For example, changes to the Engineering Design and Construction WSS Set would impact both the East Tennessee Technology Park and the Oak Ridge National Laboratory and may require coordination between the contractors operating those two facilities and subcontracted construction management responsibilities.
11. Select Approval Authorities at a level appropriate for the scope of the proposed WSS change. It is not necessary for the ORO Manager and the top contractor manager to approve every revision. 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>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 change effort for a project should focus on developing a project-specific IA 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 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.

- 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.

CONTRACTOR NAME
COMMENT/CONCURRENCE FORM
WORK SMART STANDARDS (WSS) SET REVISION

PART A (To be completed by the Directives Management Group, AD-440)

TO: [COR]
[DPI]

REVISION REQUEST DATE:

REVISION REQUEST SUBJECT:

WSS SET(S) AFFECTED BY REVISION:

The attached proposed WSS Set revision is forwarded for review. Complete Part B and fax this form to Team Leader, DMG, AD-440, by **[due date]** at 576-4046.

PART B (To be completed by the addressee [COR or DPI]): **NOTE:** Review of the proposed WSS revision should be made by Subject Matter Experts (SMEs) familiar with the contractor's programs.

CONCURRENCE: (Check One).

Yes ___ = Concurrence with the proposed WSS Set revision in its entirety

No ___ = Nonconcurrence. Identify specific issues. Attach extra sheets if necessary.

CONTRACTING OFFICER'S REPRESENTATIVE

IDENTIFY CONTACT POINT:

Name Telephone

SIGNED:

Signature of COR Date

DIVISION OF PRIMARY INTEREST

IDENTIFY CONTACT POINT:

Name Telephone

SIGNED:

Signature of DPI Date

DEFINITIONS

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

1. ADEQUACY. Adequacy is achieved when a set of ES&H-related standards/requirements selected to control the work and associated hazards for specific sites, facilities, or activities has been approved by 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 S/RID and WSS Set development and 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. CONFIRMATION TEAM. The Confirmation Team is responsible for verifying that the ID Team followed the WSS process and for confirming the adequacy of the proposed WSS Set. The Confirmation Team consists of subject matter and operational experts that are independent from the organization performing the work, as well as middle/senior management representatives from ORO and the contractor. A representative from each appropriate DPI should be included on the Confirmation Team. The Confirmation Team may include hired outside experts or others as appropriate.
4. 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 COR, and a senior member of the Office of Assistant Manager for Environmental, Safety, Health, and Emergency Management (Division Director or above).

The Convened Group has the following roles and responsibilities:

- Confirms the appointment of the Process Leader proposed by the contractor.
- Identifies any technical and management expectations, including any private industry benchmarks for the proposed WSS document.
- Determines the scope and coverage of the WSS Sets, including whether all hazards or an identified subset of hazards will be covered and which facilities, issues, or subject matter areas will be included (Particular attention should be paid to whether safety management system areas as quality assurance, illness and injury reporting, employee concerns, and assessment programs will be included.).
- Ensures adequate coverage of interfaces with such areas as management systems that may not be included in the WSS Set or which may not be directly linked to a particular hazard.

- Appoints the members of the ID team; multiple ID teams may be appointed as appropriate.
- Determines if confirmation will be done by the ID team or a separate team and appoint members of the Confirmation Team, if needed.
- Ensures appropriate Stakeholder representation or involvement in the process.
- Develops additional protocols, if needed.
- Ensures that differences of opinion (Stakeholders and commenters) and ID Team minority opinions have been fully discussed before being raised to the Convened Group; mediates as necessary to secure consensus where possible.

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 Groups (TCG) to whom it delegates certain of its responsibilities. If this occurs, the TCG must meet with the ECG on a regular basis to report progress, obtain agreement on proposed actions, etc. The ECG normally consists of senior-level ORO and contractor management and DOE HQ personnel.

5. 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.
6. ID TEAM. The quality of a WSS document depends on the quality of the team responsible for its development and maintenance. 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 (a) contractor line managers, SMEs, and workers and (b) ORO line managers and SMEs. The ID Team may include other DOE personnel (e.g., DOE HQ program office personnel). Contractor management may also decide to hire outside experts, personnel from other contractor organizations, etc., to serve on the ID Team. If confirmation is to be handled by the ID Team, the team must include subject matter and operational experts independent from the organization doing the work.

The ID Team may call on SMEs from within the contractor's organization, DOE, outside experts, and Stakeholders to obtain recommendations on selection of standards in those persons area of expertise. Although ID Team members must be empowered by their management to make decisions for the organization(s) that they represent, they are expected to maintain a constant flow of information back to the members of their organization regarding the team's progress, decisions made, standards selected, etc., and to take feedback from their organizations into account when making decisions.

If the Convened Group determined that a separate Confirmation Team was unnecessary, the ID Team is solely responsible for ensuring the adequacy and feasibility of the WSS Set.

7. 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.

8. IMPLEMENTATION GUIDANCE. Suggested guidance for implementing WSS or S/RID.
9. OPERATIONAL EXPERT. Personnel knowledgeable of site/facility activities, processes, programs, policies, and procedures (e.g., Facility Representative, Facility Manager, etc.).
10. PROCESS LEADER. The Convened Group appoints a Process Leader once the Convened Group determines that a WSS Set is needed and further actions are necessary. The Process Leader is the coordinator of the WSS Set development.

The Process Leader has the following roles and responsibilities:

- Schedules and facilitates the ID team meetings and enforces the meeting protocol decided upon by the team.
- Works with contractor and ORO management to ensure that requested SMEs are available to make recommendations to the ID Team with regard to selection of standards in their area of expertise.
- Coordinates with contractor management to ensure the appropriate level of worker involvement, either as ID Team members or SMEs brought in to advise the team. (For purposes of the WSS process, "workers" may include, for example, craft personnel, engineers, designers, researchers, ES&H professionals, and others).
- Coordinates with contractor and/or ORO management to ensure that any ID Team members who have to leave the team are replaced with personnel who are equally knowledgeable and experienced.
- Documents recommendations made by SMEs called in by the ID Team.
- Documents the ID Team's decisions regarding identification of hazards and selection of standards.
- Ensures that the viewpoints of all team members and SMEs are heard and fully discussed; strives to lead the team consensus; and if consensus is not reached, manages the ID Team Minority Report process.
- If appropriate and with assistance from the ID Team, schedules and facilitates open discussions and comment sessions for the proposed WSS Set.
- Develops the justification of adequacy report (i.e., the Final Report), including any unresolved Minority Reports, and ensures that all ID Team members sign the report before sending it to the Confirmation Team.

- If appropriate and with the support of the ID Team, briefs the Confirmation Team on the WSS Set development process as it was followed by the ID Team.
 - Assembles the Final Report, which includes the WSS Set, the Confirmation Team report and recommendations, the adequacy report, and other material as discussed in Paragraph 5 of this Chapter, and forwards it to the Approval Authorities or the COR or as directed by the Convened Group.
 - Forwards the approved WSS Set, the Final Report, and backup documentation to DMG. Backup documentation includes issues identification documents, meeting notes, relevant e-mail messages, resolved Minority Reports that were not forwarded to the Confirmation Team, etc. Documentation that reflects some synthesis or summary (e.g., issues raised, major discussion points, resolution) is generally more useful than a mass of raw data.
11. 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.
12. SOURCE DOCUMENT. The standard in which a requirement originates, such as DOE/ORO Directives or Rules, laws, regulations, or voluntary consensus standards. An organization's internal policies and procedures are implementing documents, not sources of requirements.
13. 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 teams unless the provisions of the Federal Advisory Committee Act are invoked.

14. 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.

15. 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. Subject matter experts may serve as assessors, prepare and/or review corrective action plans and implementation plans, help develop or review WSS Sets, and review S/RID and WSS Set change packages.
16. 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.
17. 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). Per the Office of Management and Budget Circular A-119, dated February 19, 1998, a voluntary consensus standard is one that has been adopted by a voluntary consensus standard body; and industry standards, company standards, and de facto standards are not considered to be voluntary consensus standards.
18. 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:
 - Defining the work and associated hazards,
 - Creating the teams,
 - Defining the protocols and documentation requirements,
 - Identifying the WSS Set of standards/requirements,
 - Confirming the WSS Set, if necessary, and
 - Approving the WSS Set.

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