

DIRECTIVES CONTROL FORM - ORO O FINAL DIRECTIVE

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

1. **NUMBER AND TITLE OF DIRECTIVE:** **ORO O 450, Chapter IV, ENVIRONMENT, SAFETY, AND HEALTH (ES&H) OVERSIGHT PROGRAM**
2. **PURPOSE OF TRANSMITTAL:** New Directive Revised Directive Page Change
3. **THIS DOCUMENT MAY AFFECT THE WORK PERFORMED BY THE FOLLOWING CONTRACTORS:** (Check appropriate boxes)

No (all contractors)

Yes If yes, whom? LMES LMER ORAU SURA

Bechtel Jacobs Company

Other contractors (list by type) All other ORO contractors and subcontractors

Many ORO contractors have approved S/RIDs or 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.

4. **SIGNIFICANT PROVISIONS:** Are there any significant changes or impact?

No Yes If yes, describe: This new ORO directive has been written to transmit current policy concerning the ES&H Oversight Program.

5. **CONTACT POINT:** Mike Smith Technical Support Division, SE-32 576-0973
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 O 210, Chapter I, Change 1	03/31/1998	ORO O Control Form	12/29/1999
ORO O 220, Chapter VIII, Change 1	03/31/1998	ORO O 450, Chapter IV Pages IV-1 through IV-8	12/29/1999

ORO Orders are available on the ORO Directives Management Home Page at http://www.ornl.gov/doe_oro_dmg/orchklt.htm. The ORO Orders 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

Kenneth W. Warden, AD-440
Signature Management Analyst, AD-440

12/29/1999
Date

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

Rev. 11/30/1999

U.S. Department of Energy

Oak Ridge Operations

ORO O 450
Chapter IV

DATE: 12/29/1999

SUBJECT: ENVIRONMENT, SAFETY, AND HEALTH (ES&H) OVERSIGHT PROGRAM

1. PURPOSE. This Order establishes the elements of an effective Oak Ridge Operations (ORO) line oversight program for the Environment, Safety and Health (ES&H) Program, which for the purposes of this Chapter also includes the Quality and Emergency Management Programs. This Chapter completes the transition from the previous directive (ORO O 220, Chapter VIII, Change 1, ENVIRONMENT, SAFETY, HEALTH, AND QUALITY ASSESSMENT PROGRAM, dated March 31, 1998). This Chapter correlates to DOE P 450.5, LINE ENVIRONMENT, SAFETY AND HEALTH OVERSIGHT, dated June 26, 1997, and DOE O 210.1, PERFORMANCE INDICATORS AND ANALYSIS OF OPERATIONS INFORMATION, dated September 27, 1995. Nothing in this issuance changes any requirements contained in any DOE Order.
2. CANCELLATION. This Order cancels and replaces ORO O 220, Chapter VIII, Change 1, ENVIRONMENT, SAFETY, HEALTH, AND QUALITY ASSESSMENT PROGRAM, dated March 31, 1998, and ORO O 210, Chapter I, Change 1, PERFORMANCE INDICATORS AND ANALYSIS OF OPERATIONS INFORMATION, dated March 31, 1998.
3. APPLICABILITY. The provisions of this Order apply to ORO Principal Staff and to ORO contractors.
4. RESPONSIBILITIES.
 - a. Manager.
 - (1) Establishes Integrated Safety Management (ISM) and oversight policy.
 - (2) Approves ISM system (ISMS) descriptions.
 - (3) Appoints ISMS verification team leaders.
 - (4) Approves oversight programs developed by the Contracting Officer's Representatives (CORs).
 - (5) Approves ISMS verification plans.
 - (6) Transmits improvement plans to appropriate DOE Headquarters (HQ) offices or approves improvement plans if approval authority has been delegated.
 - (7) Requests for-cause reviews, as necessary.
 - b. Assistant Manager for Environment, Safety, and Quality (AMESQ).
 - (1) Serves as the focal point for the coordination of oversight activities within ORO.

- (2) Coordinates all ISM activities within ORO.
 - (3) Supports the programmatic development and implementation of ORO line oversight, as requested by the CORs.
 - (4) Facilitates/coordinates the programmatic development of the ORO Facility Representative Program in support of all line programs.
 - (5) Conducts independent verification of closure of improvement plans for findings from the DOE HQ Office of Oversight (EH-2) and closure of other corrective actions at the request of the COR. Serves as point-of-contact for inspections/ investigations by EH-2.
 - (6) Develops and coordinates an Issues Management System (IMS) within ORO, to include the following:
 - (a) Implement and manage an ORO IMS to track issues of major significance, including actions to resolve issues identified by EH-2, Accident Investigation Boards, and analyses of contractor or ORO performance.
 - (b) Analyze contractor performance to identify opportunities for improvement as requested by line and ORO management.
 - (c) Evaluate trends from areas identified for improvement and recommend additional improvements as requested by line or ORO management.
 - (7) Conducts for-cause reviews, as requested by the CORs or ORO Manager.
 - (8) Conducts periodic assessments of ORO line management implementation of roles and responsibilities as assigned in the approved ORO Manual of Safety Management Functions, Responsibilities, and Authorities (FRAM - see paragraph 6 below).
 - (9) Provides subject matter staff at the request of ORO line managers to assist with operational awareness activities.
- c. Assistant Managers for Administration; Laboratories; Uranium and Engineering Services; Defense Programs; Environmental Management; and Asset Utilization.
- (1) Direct each COR to develop an ES&H oversight program in keeping with DOE P 450.5 and this Chapter.
 - (2) Ensure that policies established by the Manager are implemented.
 - (3) Provide support for ISMS verifications, periodic assessments, and for-cause reviews, as requested.

d. Contracting Officer's Representatives.

- (1) Develop an ES&H oversight program in keeping with this Chapter and DOE P 450.5, including the following:
 - (a) Document and maintain an ES&H oversight program that addresses and supports the five key elements of ISMS as defined in paragraph 2 of DOE P 450.5.
 - (b) Ensure that the oversight program addresses the key elements of an effective program as defined in DOE P 450.5.
- (2) Establish and implement an operational awareness program that monitors contractor performance using line organization staff with support from matrix organizations (Facility Representatives, Subject Matter Experts [SMEs], etc.), as appropriate. Provide significant documented results to the contractor as input to their improvement program and to AMESQ for use in the analysis of cross-cutting issues.
- (3) Establish and monitor contractor performance against ES&H performance measures and other ES&H indicators. Document and distribute results (distribution to include the AMESQ).
- (4) Conduct required Readiness Assessments and Operational Readiness Reviews consistent with contractual requirements.
- (5) Conduct authorization basis document reviews (such as those needed for Safety Analysis Reports, Technical Safety Requirements, and Bases for Interim Operations) consistent with contractual requirements.
- (6) Coordinate with the Manager and the AMESQ on the scope of an Integrated Safety Management System (ISMS) verification review, concur in team leader selection and review improvement plans.
- (7) Ensure that contractors prepare improvement plans for EH-2 findings and transmit plans through the Manager to the appropriate DOE HQ Program Office.
- (8) Support the ORO IMS and ensure that contractors develop a system to provide input to the IMS. Review contractor IMS to ensure it is in place and adequate.
- (9) Review contractor ES&H performance evaluations and ensure that improvement plans are in place.
- (10) Request for-cause reviews, as necessary.

- (11) Conduct a periodic, value-added appraisal of contractor activities to validate their ES&H program (including ISMS) with support from the AMESQ.
- (12) Submit copies of reports from all significant oversight activities to the appropriate Federal or contractor office for distribution and for required improvements.
- (13) Review and approve, or recommend for approval, improvement plans submitted by the contractor and track them to completion in accordance with DOE P 450.5.
- (14) Evaluate trends of identified issues and needed improvements for the contractor and share results with the AMESQ.
- (15) Develop an annual self-assessment plan/schedule.
- (16) Maintain a database (information pool) of ES&H assessment reports.
- (17) Analyze contractor performance information and self-assessment data, and identify opportunities for improvement. Distribute that data to the contractor, the ORO Manager, and the AMESQ.
- (18) Ensure that Standards/Requirements Identification Documents and Work Smart Standards sets are kept current with assistance from the Directives Management Group (DMG).
- (19) Implement roles and responsibilities for the DOE HQ and ORO FRAMs, with assistance from the DMG.
- (20) Perform those tasks identified in DOE O 210.1, paragraph 5.
- (21) Share contractor self-assessment data with AMESQ.
- (22) Ensure that prime contracts contain a requirement for ES&H Oversight of direct subcontractors and their subcontractors, consistent with this Chapter.
- (23) Support ISMS verifications, periodic assessments, and for-cause reviews, as requested.

5. REQUIREMENTS AND PROCEDURES.

- a. Oversight Program Objectives. ORO's ES&H Oversight Program is consistent with DOE Policy 450.5 and the principles and functions of ISM as defined therein. This Policy Statement describes the components of an effective ES&H oversight program, while allowing sufficient flexibility in implementation details.

b. Requirements.

- (1) CORs will ensure that their contractors' maintain a robust, rigorous, and credible ES&H self-assessment program which is linked to the contractor's ISMS and includes elements that address the following:
 - (a) Performance measures and performance indicators.
 - (b) Line and independent evaluations.
 - (c) Compliance with applicable requirements (Rules, regulatory standards, contract terms).
 - (d) Data collection, analysis, and improvement plans.
 - (e) Continuous feedback and performance improvement.
- (2) Each COR will implement an oversight program that includes the following elements:
 - (a) Operational awareness of contractor work activities, typically through COR staff and matrix support staff, including Facility Representatives, SMEs, and other specialists.
 - (b) Review of performance against contractually-established ES&H performance measures, other ES&H performance indicators, and contractor self-assessment results.
 - (c) Review and perform assessments in support of required readiness assessments, operational readiness reviews, ISMS documentation and on-site verification reviews, and authorization basis document reviews.
 - (d) Periodic, value-added appraisals of sufficient frequency and duration to confirm the contractor's safe performance of work and the effectiveness of the self-assessment program. The scope of periodic appraisals is determined by the COR with input from DOE HQ and the contractor. The appraisal team will use the COR's analysis of contractor self-assessment results, performance measures, and operational awareness as input to scoping the periodic appraisal. Appraisals by non-line organizations, such as EH, or external agencies, such as the Environmental Protection Agency and State agencies, are to be fully considered and not duplicated without valid rationale. The appraisals are to be conducted primarily by DOE employees, with a minimum of contractor SMEs. Issues identified but unresolved during a periodic appraisal are referred to the COR for further examination.
 - (e) For-cause reviews, as necessary.

6. REFERENCES.

- a. 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, dated May 5, 1994.
- b. DOE P 450.4, SAFETY MANAGEMENT SYSTEM POLICY, dated October 15, 1996.
- c. DOE P 450.5, LINE ENVIRONMENT, SAFETY AND HEALTH OVERSIGHT, dated June 26, 1997.
- d. DOE O 232.1A, OCCURRENCE REPORTING AND PROCESSING OF OPERATIONS INFORMATION, dated July 21, 1997.
- e. DOE O 414.1A, QUALITY ASSURANCE, dated September 29, 1999.
- f. DOE O 425.1A, STARTUP AND RESTART OF NUCLEAR FACILITIES, dated December 28, 1998.
- g. ORO O 220, Chapter V, Change 1, APPRAISAL OF DOE CONTRACTOR PERFORMANCE, dated June 18, 1999, and any subsequent revisions.
- h. ORO O 230, Chapter IV, OCCURRENCE REPORTING AND PROCESSING OF OPERATION INFORMATION, dated February 28, 1997, and any subsequent revisions.
- i. ORO O 410, Chapter III, Change 2, QUALITY ASSURANCE, dated November 4, 1998, and any subsequent revisions.
- j. ORO M 411.1-1B, MANUAL OF SAFETY MANAGEMENT FUNCTIONS, RESPONSIBILITIES, AND AUTHORITIES, LEVEL II, FOR OAK RIDGE OPERATIONS (ORO FRAM), dated October 31, 1998, and any subsequent revisions.
- k. ORO O 420, CHAPTER IV, CHANGE 2, CONDUCT OF OPERATIONS REQUIREMENTS FOR DOE FACILITIES, dated December 17, 1998.
- l. U.S. Department of Energy Report on Contract Reform, Action Item No. 27, "Department-Wide Guidelines for Coordination of Contractor Oversight Programs," undated.
- m. *Oak Ridge Operations Office Facility Representatives Program Manual*, Revision 1, dated November 1995.
- n. DOE-STD 7501-95, *Development of DOE Lessons Learned Programs*, Change 1, dated September 1997.
- o. DOE-HDBK 7502-95, *Implementing US Department of Energy Lessons Learned Programs*, dated August 1995.

7. DEFINITIONS.

- (a) **Periodic Assessments** are assessments involving multiple assessment team members with diverse scopes. These assessments are carefully planned and may require significant contractor and DOE preparation. These assessments are coordinated across DOE organizations/programs. Periodic Assessments require more formality in the conduct of the assessment, including entrance meetings, daily or weekly briefings, and exit meetings.
 - (b) **For-Cause Assessments** are reviews required “for-cause.” Any condition that has caused or poses an imminent danger to people, property, the environment, or the operational integrity of a facility is reason for a for-cause review at any site within the ORO complex. For-cause reviews may be chartered by the Manager, an Assistant Manager, a COR, or a line manager, and conducted when analysis of information from the contractor, the line organization, or ORPS report indicates a situation of sufficient concern to the chartering official to warrant a special assessment. Such reviews may also be chartered based upon assessments from other organizations, and/or based upon events occurring elsewhere that may have implications to ORO’s operations. The chartering official will appoint the leader and members of the team.
 - (c) **Operational Awareness Assessments**, may include any of a variety of activities, such as walkthroughs, to analyze and evaluate operations through observations, interviews, or document reviews. Walkthroughs are performance-based assessments conducted against the contractors’ procedures to ensure operational awareness. Walkthroughs, as well as any follow up, should be documented.
8. CONTRACTOR REQUIREMENTS DOCUMENT. See Contractor Requirements Document, Attachment 1 of this Chapter.
9. ATTACHMENTS. Attachment 1 - Contractor Requirements Document.

CONTRACTOR REQUIREMENTS DOCUMENT

Contractors identified in paragraph 3 of this Chapter will accomplish the following, to the extent set forth in their contract:

1. Develop and maintain a self-assessment program in accordance with DOE P 450.5 and this Chapter.
2. Incorporate key elements of an effective ES&H oversight process into their self-assessment program as identified in DOE P 450.5 and this Chapter.
3. Provide an ISMS description to ORO for approval.
4. Develop performance metrics from the management level to the activity level and provide the data to ORO on request.
5. Provide results of self-assessment activities to their COR.
6. Cooperate fully with assessment teams and make relevant facilities and materials available.
7. Prepare improvement plans addressing findings from assessments and other oversight activities within 30 days of being provided the assessment report.
8. Make necessary improvements and verify the effectiveness of those improvements.
9. Evaluate trends and use trend data to make additional improvements.
10. Provide administrative support for assessments by DOE, as requested.
11. Perform ES&H oversight of direct subcontractors and their subcontractors, consistent with this Chapter.
12. Develop a system to provide input to the ORO Issues Management System.