

LESSONS LEARNED THROUGH THE IMPLEMENTATION OF THE ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM AT THE WIPP

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The Westinghouse Waste Isolation achieved environmental excellence on August 5, 1997 through the development, implementation, and international registration of the WID Environmental Management System. WID has established environmental programs to provide safeguards for the community, the workplace, and the environment, while providing flexibility to meet the needs of our business. An Environmental Management System (EMS) has been implemented to manage the WIPP's environmental obligations in a safe and effective manner. The EMS establishes the necessary organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, and maintaining the WID Environmental Management Policy, MP 1.14.

This paper was developed to provide the reader with a general understanding of ISO 14001 and to share some of lessons we have learned during the development, implementation, and registration of the WID EMS. Lessons learned are outlined by subject area and address responses to the most frequently asked questions about the EMS registration process.

The EMS implementation process included the development of the Environmental Management System Implementation Document, the identification of significant environmental aspects and impacts, the development of objectives and targets to address these environmental impacts, and the training of WIPP personnel to more effectively implement the EMS.

The EMS Implementation Document functions as a "roadmap" describing how the various WIPP policies, plans, and procedures, and legal and regulatory requirements are integrated into daily TRU waste and hazardous waste management operations. The ISO 14001 Standard requires an organization to commit to continual improvement of its environmental activities, the prevention of pollution, and compliance with applicable legal requirements. This document is an important component of the WID EMS because it also describes how these three key management processes are achieved and defines the responsibilities of the various personnel and organizations needed to implement the EMS at the site.

The identification of significant environmental aspects and impacts, and associated objectives and targets was completed through the evaluation of operational processes, and regulatory documents. As a federal facility, WIPP is subject to the National Environmental Policy Act (NEPA). The NEPA requires WIPP to evaluate environmental impacts and alternatives of new actions and proposed facility modifications. The Safety Analysis Report developed for WIPP addresses radiation safety issues to ensure that WIPP operations protect the safety of the public and the environment. The Safety Analysis Report is revised to evaluate safety impacts any time major facility modifications are made. Similarly, many of the operational activities at the WIPP are driven by the Resource Conservation and Recovery Act (RCRA) Part B Permit Application, the WIPP Disposal Decision Plan, the WIPP Pollution Prevention Program Plan, the WIPP Short and Long Term Energy Management Plan, and the WIPP Affirmative Procurement Plan. The activities, regulatory requirements, and commitments contained in each of these documents were

considered when the WID developed its list of significant environmental aspects and impacts.

A site-wide communications and training program has been implemented to expand each employees understanding of the elements of EMS, and improve our coordination of TRU mixed waste management activities. The training program initially focused on those organizations involved in activities associated with significant environmental impacts at the site. EMS training programs have now been integrated into the General Employee, Hazardous Waste Worker, and Radiation Worker training modules. Employee communications have been expanded through the use of TRU News articles, multimedia presentations, e-mail communications, and on the WIPP Home Page.

Other areas in which the WID has achieved environmental excellence include the development of a draft DOE Integrated Safety Management System (ISMS), and the receipt of DOE Voluntary Protection Program (VPP) Star status. The WID EMS, ISMS, and VPP programs go beyond the scope of the DOE Environmental Protection Requirements by the implementation of these voluntary management systems that integrate each of our regulatory specific or regulation driven compliance programs. At the WIPP, environmental compliance requirements are achieved through the WIPP Compliance Certification Application, the RCRA Part B Permit application, Air and Water permit programs, and the National Environmental Policy Act. WIPP specific regulatory requirements are described and tracked in the WIPP Site Environment Report and the WIPP Biennial Environmental Compliance Report, and the WIPP Safety Analysis Report. The implementation of each of these compliance activities are an integral part of the programs that make up the overall Environmental Management System.

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Introduction

The Westinghouse Waste Isolation Division (WID) is the managing and operating contractor at Waste Isolation Pilot Plant (WIPP). The WID began evaluating the advantages of implementing and registering our environmental system to the International Organization for Standardization's ISO 14001 Standard in early 1996. We achieved environmental excellence through the third-party registration of the Environmental Management System (EMS) at WIPP on August 5, 1997.

Why would a facility go through the expense, and effort, to pursue EMS registration? For many facilities, including WIPP, the key driver was a commitment by management to demonstrate good environmental stewardship. By conforming to the requirements of the ISO 14001 Standard, we gain the credibility of this internationally recognized standard. Additionally, with the significant amount of regulatory and stakeholder oversight that most U.S. Department of Energy (DOE) facilities receive, the third-party registration of the system provides one more process for demonstrating that we are capable of safely managing and disposing of transuranic (TRU) mixed wastes. Similarly, EMS registration is a sound business practice. At WIPP our EMS registration is a demonstration of our commitment to implement a strong EMS to both the DOE and our customers in the private sector. It is not uncommon to hear from our customers, particularly foreign customers, that an EMS registration is critical for consideration in the development of subcontract proposals.

Another driver at WIPP was an effort to bring our environmental culture up to the level of our safety culture. Our registration helped other internal groups such as Facility Operations, Maintenance, and Quality and Regulatory Assurance identify their role in environmental processes. The EMS and Voluntary Protection Program (VPP) provided the foundation for the DOE and WID to develop and certify the WIPP Integrated Safety Management System (ISMS).

This paper was developed to provide the reader with a general understanding of ISO 14001 and to share some of lessons we have learned during the development, implementation, and registration of the WID EMS. Lessons learned are outlined by subject area and address responses to the most frequently asked questions about the EMS registration process. Responses have been provided by personnel associated with the implementation of EMS at DOE facilities throughout the DOE complex, DOE personnel responsible for the development of EMS policy programs at DOE Headquarters, and the president of the Registration Accreditation Board.

Key Factors in the Successful Registration of the EMS at the WIPP

The EMS was established to provide safeguards for the community, the workplace, and the environment while providing flexibility to meet our business needs. The EMS integrates the necessary organizational structure, plans, procedures, and resources necessary to develop, implement, and maintain our Environmental Management Policy.

Several factors were key to WID's successful EMS registration. First and foremost is management commitment. Once a decision to obtain third-party registration for an EMS was made, WID senior and line managers provided their unconditional support for the EMS implementation process. This support set the stage for the commitment of the resources necessary to implement the system and greatly improved the coordination between organizations responsible for developing or revising the documents needed to register the system.

Another key factor was the development of clearly defined environmental aspects, impacts, objectives, and targets. Using a matrix format, WID developed a series of tables that identify environmental aspects and impacts, establish the significance of the impact, and identify the organization responsible for each aspect and impact. Another table defined the objectives associated with each environmental aspect and identified a target from meeting each objective. The organization responsible for each objective, and time frame for implementing each objective, was also provided. The matrix format for our environmental aspects, impacts, objectives, and target tables helped both the registrar and our employees easily understand the relationship of these functional elements of the EMS.

Another key element to the successful registration of the WID EMS was the effective communication of the EMS. The development of fun and creative education and communication programs really helped our employees get behind the EMS and created a real ownership for the process. We have had success with communicating the standard through the use of both multimedia presentations and the use of a "game show" format. These formats got everyone involved in an interactive communication of the standard. As a result of these communication efforts, our employees and subcontractors were confident in their discussions with our registrars about their role in implementing the EMS at WIPP.

Environmental Management System training has been integrated into our General Employee Training, and Hazardous Waste Worker, Radiation Worker and Hazardous Waste Responder

classes, to demonstrate continual improvement of our EMS communications activities. This ensures that each employee gets a minimum of one EMS training class per year, and provides EMS training several times per year for each employee involved with activities that could have a potential significant environmental impact. Our third-party registrar identified each of these areas as EMS elements where the project demonstrated excellence.

In 1998 our success was not limited to environmental excellence. This year the site achieved the environmental and safety "triple crown." During this period we obtained re-certification of the DOE VPP Star program, continued the registration of the WID EMS, and received Phase II certification of the WIPP ISMS.

The ISO 14001 Standard

The ISO 14001 EMS establishes guidance for the development of a comprehensive system to foster continual improvement of an organization's EMS as they work to meet their environmental responsibilities and obligations. People often mistakenly believe that the term "ISO" is an acronym for the International Standards Organization. "ISO" is a Greek word meaning "equal." The ISO standards are voluntary, consensus-driven standards applicable to large, medium, and small organizations in both developed and developing countries. The EMS standard is design to be flexible and allow organizations to customize their EMS to meet their environmental management needs. One objective of the standard is to raise the level of overall global environmental management system performance.

The EMS standard is divided into five main elements. These elements are intended to be incorporated into every EMS, and are (1) Environmental Policy, (2) Planning; (3) Implementation and Operation, (4) Checking and Corrective Action, and (5) Management Review. The standard requires that each of these elements be implemented to demonstrate the continual improvement of the overall management system. The standard does not establish absolute requirements for environmental performance beyond a commitment to develop an environmental policy, a commitment to comply with applicable environmental legislation and regulatory requirements, and a commitment to the continual improvement of the EMS.

Environmental Management Policy

The Environmental Management Policy is a publicly available statement developed by an organization's top management to comply with applicable environmental legal and regulatory requirements, and the other requirements to which an organization subscribes. The policy must also be documented, implemented, maintained, and communicated to all employees. The standard defines a commitment to establish a process to develop and review environmental objectives, and the establishment of targets to implement an organizations objectives. The policy

must also commit to continual improvement and the prevention of pollution and be appropriate to the nature and scale of environmental impacts of a company's activities, products, and services.

Planning

Planning includes the development of *Environmental Aspects*, the assessment of *Legal and Other Requirements*, the assessment of *Objective and Targets*, and implementation of *Environmental Management Programs*. Environmental aspects are an organization's activities, products, or services that can interact with the environment.

The standard requires that an organization develop procedures to:

- Identify environmental aspects and determine the significance.
- Identify the legal and regulatory requirements applicable to the organization's environmental aspects.
- Identify other requirements or voluntary standards to which the organization subscribes.
- Establish, maintain, and document environmental objectives (goals) and targets (implementation schedules) for each relevant function and level within the organization.
- Consider the environmental aspects, and legal, regulatory, financial, and operational requirements in the development of their objectives and targets.
- Establish environmental management programs describe the programs and processes that are implemented by an organization to achieve their objectives and targets.

Implementation and Operation

The elements of the *Implementation and Operational* functional area include the identification of *Structure and Responsibility*, *Training, Awareness and Competence*, *Communication* of the EMS. This element also describes the requirement to establish *Environmental Management System Documentation*, *Document Control*, *Operational Control Processes*, and implement an *Emergency Preparedness and Response* program.

It is critical that each organization define roles and responsibility and identify the documents required to implement the EMS. This can be one of the most difficult processes in the implementing the EMS. Suggestions for effectively identifying roles and responsibilities is provided in the lessons-learned section of the text.

Communication and education are important elements of an effective EMS. It is helpful to develop creative programs to educate site personnel about their role in implementing the EMS. Facilities must be aware that the registrars will evaluate how well their employees' and affected contractors understand the environmental policy and potential environmental impacts associated with a facility's operations.

Another important function of this element is the development of a formalized document control process. Most facilities already have Conduct of Operations, training, document control, and emergency response programs that can be readily modified to meet the criteria of the standard.

Checking and Corrective Action

The elements of the *Checking and Corrective Action* functional area include the development of documented procedures for *Monitoring and Measurement*, *Nonconformance and Corrective and Preventive actions*, *Records Management*, and the *Environmental Management System Auditing* process.

Important elements of the checking and corrective action functional area include the EMS audit, and quality and regulatory assurance auditing, and corrective action tracking programs. Records management and equipment calibration activities are also evaluated by the registration organization. Again, most facilities have procedurally driven programs in place to manage these activities. The implementation of the EMS process will help strengthen the effectiveness of these activities and prepare the organization for the third-party registration process.

Management Review

The standard requires that an organization's top management review the EMS to ensure that the system remains suitable, adequate, and effective. The management review is designed to identify the possible changes or revisions to the environmental policy, objectives, and targets to ensure that they remain effective. Updates to the EMS should be based on information gathered during the audit of the EMS and should take into account changing business circumstances. Feedback from senior management can then be used to ensure that the EMS is updated to demonstrate continual improvement of the EMS.

LESSONS LEARNED: THE MOST COMMONLY ASKED QUESTIONS REGARDING THE DEVELOPMENT AND IMPLEMENTATION OF AN ENVIRONMENTAL MANAGEMENT SYSTEM

For those individuals evaluating whether the implementation of the EMS is a good business decision for their organization, two factors should be evaluated up front. First, is management totally committed to the process, and second, what documents, processes, plans, and procedures, and second, does the facility or organization already have in place that could easily be modified to ISO 14001?

The implementation of ISO 14001 at WIPP involved adapting several existing programs, plans, and procedures, and updating the existing Environmental Management Policy to meet specific criteria of the standard. The Environmental Management System Implementation Document was developed to function as "road map" defining roles and responsibilities for executing the EMS. It also provides a crosswalk between the plans and procedures with function to implement ISO 14001 at WIPP and describes how significant environmental aspects, impacts, objectives, and targets are identified. The text also describes the training of site personnel and communication of the EMS.

ISO 14001 EMS Implementation: Frequently Asked Questions

To more quickly describe the processes and issues associated with the successful development and implementation of the ISO 14001 Standard, some of the most frequently asked questions about the EMS process have been provided. These questions and answers are a brief summary of a DOE-sponsored, interactive satellite video broadcast hosted by the National Environmental Training Office (NETO). The NETO organization has approved the printing of some of the

questions and answers from the satellite broadcast to further promote the communication of issues associated with the implementation of the ISO 14001 Standard.

What is the Department of Energy's position regarding implementation of environmental management systems and adoption the ISO 14001 Standard?

The ISO 14001 Standard is a tool that can assist departmental elements in improving both the management and performance of their environmental programs. We believe improved performance can result in improved compliance. The Office of Environmental Waste Management wants to increase DOE facilities' awareness of the benefits of implementing EMS. It is important to note that the standard is voluntary.

DOE Headquarters does not require the adoption of EMS. There are two reasons for this. First, there is the matter of ownership. Any system, if it is to be effective, must meet the needs of the organization. Second, almost all DOE elements have some form of an EMS in place, although it may not specifically be recognized as such. Rather than invent something new, the ISO 14001 Standard can be used to enhance and improve these existing systems and to better integrate them into an organization's management procedures.

What factors should you evaluate prior to making a decision to pursue an EMS program?

Factors that were evaluated in making a decision to pursue EMS registration included improved environmental performance and the integration of environmental management into the business. The bottom line is, whatever the reasons, they must be in concert with the strategic goals and plans of the business as a whole. Another key factor is senior management commitment and active involvement in the process. This cannot be achieved if implementation of an EMS does not line up with the direction in which the company is headed.

What were the advantages or anticipated benefits that led your organization to implement an environmental management system?

Some of the benefits or advantages are the opportunity to be recognized as a leader in environmental management, increased credibility with regulators and external stakeholders, and enhanced employee involvement and awareness. Additionally, we have derived many enhanced partnerships with other internal organizations such as Facility Operations, Maintenance, and Quality and Regulatory Assurance.

Can you offer some advice on how to satisfy the policy requirements?

Everyone should be able to reiterate the policy in their own words and know how it relates to their job duties. The standard does not clearly state that these are requirements, but our registrar has taken the position that these expectations must be met in order to demonstrate that the policy has been implemented.

We developed a more concise site-specific policy that reflects the three basic requirements of the ISO 14001 Standard. These include a commitment to continual improvement compliance with regulations and requirements and the prevention of injuries, illness, and pollution. Additionally, by developing a site-specific policy early on in the process, senior management becomes involved at the outset. This is a critical element for success.

Other important elements to ensure that policy meets the EMS policy criteria is to make the policy available to the public and ensure that it reflects the organization's commitment to comply

with applicable legal and regulatory requirements and the other programs to which the organization subscribes. The policy must also accurately reflect the nature or scope of potential environmental impacts associated with the facility's operations or mission. It is also important to keep the process simple and ensure that the environmental professionals are involved in establishing the policy.

One question typically asked by companies that are evaluating whether to implement an Environmental Management System I: "Will EPA grant regulatory relief to an organization based solely on implementation of an ISO 14001 registered EMS?"

An EMS should be implemented to ensure that there is a process or system in place to support a regulatory inspection, not to obtain regulatory relief. However, if there is a well-implemented EMS, regulatory nonconformance should be minimized, and may reduce the frequency of regulatory inspections.

How did you get started, or what are the steps necessary for implementation of an environmental management system?

Review standard requirements for applicability to your business. Then determine if management is committed to each of the requirements. For example, is the establishment of environmental goals a part of overall project goal setting? Next focus on Policy, Legal and Other Requirements and Environmental Aspects. These are the three primary elements of the standard that serve to drive the rest of the system.

Next conduct an inventory of your organization's environmental programs and activities. Compare your programs and activities against the requirements of the standard and determine the amount of effort it would take for you to conform to the standard. A good place to start is the review of your existing National Environmental Policy Act documentation.

The use of existing policies, plans, procedures, and program management processes are critical to the development and implementation of an EMS. Consider incorporating your existing program management process in the EMS. This allows each organization responsible for implementing and tracking environmental objectives and targets to ensure that the personnel and resources needed to meet their EMS commitments are included in each year's approved budget.

Another process that will help with the integration process is a teaming approach. At many facilities EMS Coordinators is supported by an ISO Integration Team. The integration team can be instrumental in developing department-wide communication of the EMS, helping draft EMS document, and assisting with education and training presentations.

What are the most critical elements of implementation?

Strong management commitment is critical from the start. It sets the stage for the committing the resources to implement the system, and greatly improves the coordination between the organizations responsible for developing or revising the procedures and plans needed to develop the system.

Be careful not to get too detailed in your initial evaluation and selection of environmental aspects and impacts. This can complicate the assessment of potential environmental impacts at your site. We recognized that by grouping our aspects and impacts by larger activities we

simplified the identification of objectives and targets and the organizations responsible for implementing them.

Management commitment is a critical component to implement an environmental management system. How do you get it?

Demonstrate to management how ISO 14001 will serve their needs/interests of the business. If it doesn't align with the strategic objectives of the organization, then don't do it! Additionally, reinforce the benefits of increased communication and cooperation between operational organizations, and increase perception of the organization as a leader in environmental excellence.

What are the key processes that can be used to make employees aware of the EMS, and how did you do it?

The development of fun and creative education and communication programs really helped our employees get behind the EMS and instilled ownership for the process. We've had success with communicating the standard through the use of both multimedia presentations and the use of a "game show" format. We added these programs to the more traditional communications tools such as computer-based training, company news letters, e-mail communications, and ISO 14001 badges.

At WIPP we developed these programs after we conducted a survey of our employees to determine their understanding of the EMS using site news articles and e-mail communications. Our survey indicated that we had failed to recognize an overlap resulting from numerous environmental and safety programs. The survey results demonstrated that many employees considered the EMS as just one more safety program. The development of fun and entertaining interactive communication programs helped us single out the EMS, and forced us to look at the effectiveness of other communication efforts at the site.

What role did you find that training played in the implementation of an EMS program?

We obtained or provided training on several levels. A handful of the key personnel responsible for overall EMS implementation attended off-site training. We added EMS training modules to our General Employee Training and our Hazardous Waste Worker, Radiation Worker and Hazardous Waste Responder classes. This ensures that each employee gets a minimum of one EMS training class per year, and provides EMS training for each employee involved with activities that could have a potential significant environmental impacts several times per year.

It is also important to be aware of what the registrars are looking for regarding training. Our experience shows that the registrars want to see that your employees are aware of the Environmental Management Policy of your site or facility. They also want to see that your training programs focus on the significant environmental aspects and impacts of your facility and that each employee is aware of how they could impact the environment.

How does gap-analysis help with EMS development?

The GAP analysis process forces a site wide comparison of how various programs, processes, and requirements are implemented at a site. The GAP analysis requires you to look and compare every requirement of the standard, not just what the user thinks is important. The process also highlights glaring weaknesses, raises awareness of details, and provides methodology for sharing information.

At WIPP we were very fortunate to have a corporate ISO task group to help us conduct a GAP analysis of the WIPP EMS early in the systems development. This group provided us with a tremendous amount of information about their experiences in the development of their EMS. They helped us focus on developing clear and concise objectives and targets, provided us with suggestions on simplifying our assessment of Environmental Aspects and Impacts, and clarified the need to clearly identify roles and responsibilities for implementing the EMS.

This same group conducted our first EMS audit, which helped us prepare for our third-party registration audit. I would highly recommend any type of corporate or task team sharing of information. This significantly reduces the time it takes to implement an EMS, and allows you to learn from the issues identified by other organizations.

How does the EMS relate to other DOE Programs?

People frequently ask, how does this relate to the ISMS? The short answer is that ISMS requires that environmental programs be integrated with safety and health. The EMS can be a useful tool for implementing environmental requirements into an ISMS. At the present time most of the focus has been on safety and less on health and environment. We will be working to bridge this communications gap by working closely with the Safety Management Implementation Team responsible for developing ISM guidance.

Have you considered merging your EMS with other systems or programs?

Yes, we have integrated our EMS and the VPP into the WIPP ISMS. As these programs have developed, we integrated our EMS and VPP programs as a subset, or supporting, programs for our ISMS. This provides an additional focus on the concept that ISMS includes the protection of the environmental, and also furthers the Plan, Do, Check, and Act concept of both systems.

Did your organization develop an EMS manual to organize the information that makes up your EMS documentation?

Although the EMS Standard does not require the development of an EMS manual, most facilities do so. At WIPP we debated the best way to pull together the documentation that describes how the site identified the environmental aspects, defined impacts associated with our selected aspects, and developed a process to determine the significance of the impacts associated with that aspect. Due to the large number of plans and procedures that make up the EMS, and our goal to use our existing document management process, we decided on an implementation document that functions as a "road map." The road map outlines the requirements of the standard and identifies the applicable policies, plans, and procedures that implement the individual sections of the standard. Using this concept reduced the number of procedures that needed to be developed for the EMS and, more importantly, provided a clear link of responsibilities between the organization's responsible for implementing the EMS.

Why obtain third-party registration as opposed to self-declaration? What are the pros and cons?

ISO 14001, as a system, is an excellent tool for any organization serious about improving their environmental performance. The decision to obtain third-party registration has to be made on a site-by-site basis. This relates back to our site's effort to increase credibility with the regulators and the external stakeholders. An independent, third-party registration offered the WID the most credibility.

What have you learned about the registrar selection process?

Selection of a registrar that is familiar with your type of facility is very important. At our site it was very important to find a registrar with a background in environmental, engineering and regulatory requirements at nuclear and hazardous waste facilities. It is important to develop open communications with your registrar. Due to the number and scope of registration audits required to maintain your registration, you will establish a long-term relationship with your audit team.

What happens if a registrar finds an ISO nonconformance at your facility during the registration audit?

First it is important to note that registrars are not regulators. They're looking at systems and programs, not at violations or state or federal laws. There are several degrees of nonconformity's within the ISO registration auditing process. Typically, these are observations, and minor and major nonconformity's.

An observation is just that - an observation. It is not a violation of the criteria. Typically, it indicates that there may be a better way to monitor a process, document a procedure, etc. It's not a problem, it's just a potential for improvement - a way to avoid future problems.

A major nonconformity occurs when one of the criterion of the standard is not addressed or has not been addressed adequately. Typically, these occur when an organization has not addressed all of the requirements of a specific element or criterion. These also occur when an organization has put a process or procedure in place, but has not fully implemented it. A major nonconformance can also occur if a significant number of minor nonconformance occur in a given area, or against a given element, which points to a systemic failure.

What happens if the registrar discovers a notice of violation during the registration audit? Do you fail?

An notice of violation (regulatory noncompliance) won't necessarily result in failing the registration audit. Registrars recognize that facilities may be out of regulatory compliance at one time or another. The registrar's audit team will look at how you handled situation; did your system identify how to address the noncompliance; was it reported quickly and properly; was a root cause analysis completed to prevent future violations?

What are the costs and time frames associated with third-party registration of an EMS?

The costs to complete our EMS registration are difficult to ascertain. Within the DOE complex we are already required to have in place a significant number of the policies, plans, procedures, and programs necessary to implement an EMS. We have worked to use or modify our existing programs and documentation to develop the our EMS. At WIPP, the cost for initial third-party registration and associated documentation was approximately \$30,000. Each of our six-month registration assessment audits cost approximately \$5,000. One full-time senior scientist was assigned the task of developing and implementing the EMS. The EMS coordinator was assisted by a volunteer, ten-person, ISO Implementation Team. The development and initial registration process took approximately one and a half years to complete. We also spent approximately \$65,000 for subcontractor support and promotional items as a part of our EMS registration efforts.

WHERE DO WE GO FROM HERE?

WID is currently working with the DOE Carlsbad Area Office (CAO) and their support contractors to determine if it is appropriate for CAO to be included in the WID EMS registration. As previously described, the CAO is a part of the site's VPP and ISMS certifications.

The WID has undergone two semiannual EMS surveillance audits. Work is under way to further integrate both the EMS and the VPP into the ISMS. This integration is a combination of expanding our environmental and safety cultures to develop an increased awareness of how each of us can support the application of safety and environmental programs into our day-to-day activities.

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