"EFCOG's Knowledge Portal Review" 2011 Waste Management Symposium DOE Directives Reform Initiative



Presented by

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EFCOG ES&H Working Group
Panel Session 59
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DOE HSS DIRECTIVES REFORM - OVERVIEW



- DOE-HQ Deputy Secretary issued "DOE 2010 Safety & Security Reform Plan"
- Sixty-two (62) Directives identified for review
- Working Groups formed within DOE (April 2010)
- EFCOG Working Group assisted DOE
- DOE-HSS assigned 26 Directives, formed Worker Safety & Health Working Group

DOE HSS DIRECTIVES REFORM WORKER SAFETY & HEALTH



- Background
 - Worker Safety & Health Working Group (S&H WG) formed April 2010
 - S&H WG comprised of DOE and Contractor staff to work collaboratively
 - WG meeting held April 2010 to develop Plan, Strategy, and Tactics
- Safety / Health Group Members
 - Dr. Pat Worthington, Team Lead / Chair
 - Jeff Smith, ORNL, Co-Chair
 - Members: Frank Russo, Stephanie Short, Larry Kelly, Terry Krietz, Patrick Hoopes, Kenneth Hoar, Bill McArthur, Ali Ghovanlou, Michael Baker, Steve Ward, Bill Mairson, Joseph Gantos, Anthony Umek, Ray Corey, Dana Green

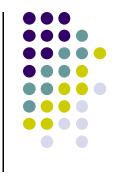
DOE HSS DIRECTIVES REFORM SAFETY & HEALTH



Formed three "Teams" to prepare "Justification Memos"

- Safety Team Bill Mairson, Steve Ward, Ali Ghovanlou
 - Scope DOE P450.2A, P450.4, P450.7, P441.1
- Oversight Team Joe Gantos, Stephanie Short
 - Scope P226.1A, Order 226.1A
- Tailoring Team Ray Corey, Pat Hoopes, Tony Umek
 - Scope P450.3, Order 251.1C, Manual 450.3-1, and DEAR Clauses
- Pat Worthington & Jeff Smith Developed Overarching Plan 7 topics
 - ORPS, Regulations; Enforcement Interfaces; Integrated Management Systems Vision; Nano; Biological Policy; Explosives Safety

RECOMMENDATIONS



The more significant recommendations include:

 Tailoring proposal to modify O251.1C to delegate authority to "tailor"

Directives to DOE Site Managers, this would:

- Authorize Site Managers (and CO's) to negotiate with Contractors (allowed by DEAR Clause – 970.5223) for a specific requirement set
- Allow cancellation of)450.3 & M450.3-1 (Necessary and Sufficient)
- Develop a single "Integrated Safety Management System" Directive, integrating several existing Directives (M450.4-1; P411.1; P441.1; P450.2A; P450.7; et al)
- Integrate the Contractor Assurance Process Directives, following NNSA's "Contractor Assurance" strategy

STATUS



- DOE Policy 450.X (Draft) reduced from 4 to 2 pages, contains no CRD (refers to DEAR Clause 10 CFR 970.5223)
- Order 450.X (Draft) reduced to 15 pages
- Order 225.1B, Accident Investigation, Completed Revcom 12/23/10; comments being resolved
- Six Directives still in review process
 - 3 Safety & Health (DOE O 252, 1A, Tech Standards; DOE O 450.2, Integrated Safety Management; and DOE O 226.1B, Implementation of DOE Oversight Policy)
 - 3 Others (DOE O 210.2A, Operating Experience; DOE O 414.1D, Quality Assurance; DOE O 436.1, Energy and Environmental Sustainability)
- DNFSB, 1/25/11, letter expressing concerns & requesting 30 day response briefing
- Consensus process tends toward prolonged reviews, reduces likelihood of full implementation

IN SUMMARY

- The S&H Working Group members were well aligned relative to streamlining
- We developed "good" proposals to truly "streamline" the Directives process, while still maintaining ISMS Guiding Principles and Core Functions
- There was real value in teaming both Federal and Contractor staff
- Revcom Process underway through March 2011
- STAY TUNED.....