# The Under Secretary of Energy



Washington, DC 20585

October 28, 1996

### MEMORANDUM FOR CHRISTINE A. ERVIN ASSISTANT SECRETARY FOR ENERGY EFFICIENCY AND RENEWABLE ENERGY

PATRICIA F. GODLEY ASSISTANT SECRETARY FOR FOSSIL ENERGY

### MARTHA A. KREBS DIRECTOR, OFFICE OF ENERGY RESEARCH

TERRY R. LASH DIRECTOR, OFFICE OF NUCLEAR ENERGY, SCIENCE AND TECHNOLOGY

FROM:

SUBJECT:

Integrated Safety Management System Implementation at DOF Facilities

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The Secretary's approval of the Safety Management System Policy, DOE P 450.4, on October 15, 1996, (copy provided at Attachment 1) requires the Department to implement an integrated Safety Management System (SMS). The Secretary has directed several actions that will lead the Department to improved safety performance. These actions will result in better integration of work and safety, or simply put, will enhance our ability to "do work safely."

THOMAS P. GRUMBLY

Over the past several months, under Frank McCoy's leadership of a Safety Management Implementation Team, there has been a concerted effort to develop policy and guidance for implementing an integrated Safety Management System at ten priority facilities that are under the aegis of Defense Programs (DP) and Environmental Management (EM). I recognize and appreciate the contributions and efforts of the staff personnel who represented your organization and worked with us to develop this SMS policy and guidance for the Department.

This effort has now progressed to the point where it is appropriate to commence implementation throughout the Department. The purpose of this memorandum is to ask you to help us progress the SMS effort within your areas of responsibility. Your help is needed in a variety of areas; however, as a first step, I request that you identify those facilities and laboratories where the SMS can be, is being, or has been implemented. I recognize that many facilities have made significant progress and are already developing many of the necessary elements for an integrated Safety Management System. Some have committed to negotiate contract revisions that require SMS implementation and take into account factors that may impact their mission and budget, such as hazards to personnel, the public, the environment, and property. Furthermore. I recognize that the SMS must be flexible and tailored, must be based on the work and its associated hazards, and must be integrated jointly by the contractor and DOE at all levels of management.

A Safety Management "Lessons Learned" Workshop is scheduled for November 19-21, 1996, in Denver, Colorado, to share the lessons learned in SMS implementation at the ten priority facilities and to address future implementation paths. This workshop will be a forum for developing plans for the next phase of our SMS initiative. Your current and intended representatives to the Safety Management Implementation Team should participate in the workshop, if possible. A list of the current team members is provided in Attachment 2. I also request that you provide to Frank McCoy by November 8, 1996, the names of designated SMS representatives for your field offices and facilities so that we may move ahead in a timely manner. The team will continue its coordination with your staff and designated representatives to ensure that the benefit of our experience and the lessons learned are provided for tailoring the SMS at your facilities. Your continuing support is needed if we are to succeed.

I solicit your cooperation and assistance and look forward to supporting your efforts in this regard as the Secretary's policy is implemented. If you have any questions or if you wish to discuss this subject further, please contact Frank McCoy at (202) 586-1418 or (803) 725-8600.

Attachments: 1. Safety Management System Policy Notice, DOE P 450.4 2. Current Safety Management Implementation Team Members

CC:

V. Reis, DP-1 T. O'Toole, EH-1 A. Alm, EM-1 D. Pearman, FM-1 F. McCoy, Director, 95-2 Safety Management Implementation Team Manager, Albuquerque Operations Office Manager, Amarillo Area Office Manager, Argonne Area Office Manager, Chicago Operations Office Manager, Idaho Operations Office Manager, Kansas City Area Office Manager, Los Alamos Area Office

cc: (continued)

Manager, Nevada Operations Office

Manager, Oak Ridge Operations Office

Manager, Oakland Operations Office

Manager, Ohio Operations Office

Manager, Richland Operations Office

Manager, Rocky Flats Operations Office

Manager, Savannah River Operations Office

Director, Morgantown Energy Technology Center

Director, Pittsburgh Energy Technology Center

Manager, Western Environmental Technology Office

Director, Ames Laboratory

Director, Argonne National Laboratory (East)

Director, Argonne National Laboratory (West)

Manager, Atlanta Support Office

Manager, Bartlesville Project Office

Manager, Batavia Area Office

Director, Bettis Atomic Power Laboratory

Manager, Boston Support Office

Manager, Brookhaven Area Office

Director, Brookhaven National Laboratory

Manager, Chicago Regional Support Office

Director, Thomas Jefferson National Accelerator Facility (former CEBAF),

Newport News, VA

Manager, Dallas Support Office

Manager, Denver Support Office

Director, Energy-Related Health Research Laboratory

Director, Energy Technology Engineering Center

Director, Energy Measurements Laboratory

Director, Fermi National Accelerator Laboratory

Manager, Fernald Field Office

Manager, Golden Field Office

Manager, Grand Junction Projects Office

Director, Hanford Environmental Health Foundation

Director, Idaho National Engineering Laboratory

Director, Inhalation Toxicology Research Institute

Manager, Kansas City Support Office

Manager, Kirtland Area Office

Director, Knolls Atomic Power Laboratory

Director, Lawrence Berkeley Laboratory

Director, Lawrence Livermore National Laboratory

Director, Lawrence Livermore National Laboratory -- Nevada Test Site

Manager, Lockheed Idaho Technical Center

Director, Los Alamos National Laboratory

Manager, Naval Petroleum Reserves - California

Manager, Naval Petroleum and Oil Shale Reserves - Colorado, Utah and Wyoming

### cc: (continued)

Director, National Renewable Energy Laboratory

Manager, Nevada Test Site, Mercury, NV

Director, New Brunswick Laboratory

Manager, New York Support Office, New York, NY

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Director, Office of Scientific and Technical Information

Manager, Pacific Area Support Office, Honolulu, HI

Director, Pacific Northwest National Laboratory

Manager, Philadelphia Support Office

Manager, Pinellas Area Office

Manager, Pittsburgh Naval Reactors Office

Manager, Portsmouth Enrichment Office

Manager, Princeton Area Office, Princeton, NJ

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Director, Sandia National Laboratories--Albuquerque, NM

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Director, Savannah River Ecology Laboratory

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Manager, Seattle Support Office

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Manager, Stanford Support Office

Director, Stanford Synchrotron Radiology Laboratory

Manager, Strategic Petroleum Reserve Project Office, New Orleans, LA

Director, Laboratory of Structural Biology and Molecular Medicine,

Los Angeles, CA

Director, U.S. Mission - OECD, U.S. Embassy, Paris, France

Manager, Waste Isolation Pilot Project Office, Carlsbad, NM

Manager, Westinghouse Electric Corp., Bettis Atomic Power Laboratory Naval

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Reactors Facility, Scoville, IN

ATTACHMENT 1

### **Department of Energy** Washington, DC 20585

September 26, 1996

EMORANDUM FOR THE SECRETARY

**Policy** 

:OM:

Tara O'Toole, M.D., M.P.H. Assistant Secretary Environment. Safety and Healt

ACTION: Approval of Policy Statement, DOE P 450.4. Safety Management System

JBJECT:

SUE:

SCUSSION:

The purpose of this memorandum is to request your approval of the policy statement requiring the Department to implement a formal, organized safety management process whereby people plan, perform, assess, and improve the safe conduct of work.

The attached policy statement establishes a Safety Management System institutionalized through Department of Energy directives and contracts. It would establish the Department-wide safety management objective, guiding principles, and functions. The system encompasses all levels of activities and documentation related to safety management throughout the DOE complex. The policy applies Department-wide, with the exception of the Naval Nuclear Propulsion Program, where the objectives of this policy are achieved by other means.

The policy statement was given full departmental coordination through the Directives System Points of Contact. and has been reviewed by the Defense Nuclear Facilities Safety Board. Subsequent to the review and comment resolution process. only editorial changes were necessary.

The development of the policy statement meets commitment 1.1 of the April 8, 1996. ENSITIVITIES Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 95-2.

The issuance of this policy statement will satisfy the first milestone in the critical **OLICY IMPACT:** process of establishing an integrated systems approach to managing safety throughout the Department.

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ECOMMENDATION: That you approve the attached policy statement.

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)ate:

October 15, 1996



# U.S. Department of Energy Washington, D.C.

# POLICY

**DOE P 450.4** 

### 10-15-96

### SUBJECT: SAFETY MANAGEMENT SYSTEM POLICY

### **PURPOSE AND SCOPE**

Safety Management Systems provide a formal, organized process whereby people plan, perform, assess, and improve the safe conduct of work. The Safety Management System is institutionalized through Department of Energy (DOE) directives and contracts to establish the Department-wide safety management objective, guiding principles, and functions.

The system encompasses all levels of activities and documentation related to safety management throughout the DOE complex. The objective of this policy is achieved by other means for Naval Reactors (Naval Nuclear Propulsion Program).

Throughout this policy statement, the term safety is used synonymously with environment, safety and health (ES&H) to encompass protection of the public, the workers, and the environment.

### POLICY

The Department is committed to conducting work efficiently and in a manner that ensures protection of workers, the public and the environment. It is Department policy that safety management systems described herein shall be used to systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the public, the worker, and the environment. Direct involvement of workers during the development and implementation of safety management systems is essential for their success.

The DOE safety management system establishes a hierarchy of components (see figure 1) to facilitate the orderly development and implementation of safety management throughout the DOE complex. The safety management system consists of six components: 1) the objective, 2) guiding principles, 3) core functions, 4) mechanisms, 5) responsibilities, and 6) implementation. The objective, guiding principles, and core functions of safety management identified below shall be used consistently in implementing safety management throughout the DOE complex. The mechanisms, responsibilities, and implementation components are established for all work and will vary based on the nature and hazard of the work being performed.

### COMPONENT 1 Objective of Integrated Safety Management

The Department and Contractors must systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the public, the worker, and the environment. This, is to be accomplished through effective integration of safety management into all facets of work planning and execution. In other words, the overall management of safety functions and activities becomes an integral part of mission accomplishment.

### COMPONENT 2 Guiding Principles for Integrated Safety Management

The guiding principles are the fundamental policies that guide Department and contractor actions, from development of safety directives to performance of work.

<u>Line Management Responsibility for Safety.</u> Line management is directly responsible for the protection of the public, the workers, and the environment. As a complement to line management, the Department's Office of Environment, Safety and Health provides safety policy, enforcement, and independent oversight functions.

<u>Clear Roles and Responsibilities</u>. Clear and unambiguous lines of authority and responsibility for ensuring safety shall be established and maintained at all organizational levels within the Department and its contractors.

<u>Competence Commensurate with Responsibilities</u>. Personnel shall possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities.

<u>Balanced Priorities</u>. Resources shall be effectively allocated to address safety, programmatic, and operational considerations. Protecting the public, the workers, and the environment shall be a priority whenever activities are planned and performed.

<u>Identification of Safety Standards and Requirements</u>. Before work is performed, the associated hazards shall be evaluated and an agreed-upon set of safety standards and requirements shall be established which, if properly implemented, will provide adequate assurance that the public, the workers, and the environment are protected from adverse consequences.

Hazard Controls Tailored to Work Being Performed. Administrative and engineering controls to prevent and mitigate hazards shall be tailored to the work being performed and associated hazards.

<u>Operations Authorization</u>. The conditions and requirements to be satisfied for operations to be initiated and conducted shall be clearly established and agreed-upon.

### COMPONENT 3 - Core Functions for Integrated Safety Management

These five core safety management functions provide the necessary structure for any work activity that could potentially affect the public, the workers, and the environment. The functions are applied as a continuous cycle with the degree of rigor appropriate to address the type of work activity and the hazards involved.

<u>Define the Scope of Work.</u> Missions are translated into work, expectations are set, tasks are identified and prioritized, and resources are allocated.

Analyze the Hazards. Hazards associated with the work are identified, analyzed and categorized.

<u>Develop and Implement Hazard Controls.</u> Applicable standards and requirements are identified and agreed-upon. controls to prevent mitigate hazards are identified, the safety envelope is established, and controls are implemented.

Perform Work within Controls. Readiness is confirmed and work is performed safely.

<u>Provide Feedback and Continuous Improvement</u>. Feedback information on the adequacy of controls is gathered . opportunities for improving the definition and planning of work are identified and implemented, line and independent oversight is conducted, and, if necessary, regulatory enforcement actions occur.

### COMPONENT 4 Integrated Safety Management - Mechanisms

Safety Mechanisms define how the core safety management functions are performed. The mechanisms may vary from facility to facility and from activity to activity based on the hazards and the work being performed and may include:

Departmental expectations expressed through directives (policy, rules, orders, notices, standards, and guidance) and contract clauses.

Directives on identifying and analyzing hazards and performing safety analyses.

Directives which establish processes to be used in setting safety standards.

Contractor policies, procedures and documents (e.g., Health and Safety Plans, Safety Analysis Reports, Chemical Hygiene Plans, Process Hazard Analyses) established to implement safety management and fulfill commitments made to the Department.

### COMPONENT 5 Responsibilities for Integrated Safety Management

Responsibilities must be clearly defined in documents appropriate to the activity. DOE responsibilities are defined in Department directives. Contractor responsibilities are detailed in contracts, regulations and contractor-specific procedures. For each management mechanism employed to satisfy a safety management principle or function, the associated approval authority needs to be established. The review and approval levels may vary commensurate with the type of work and the hazards involved.

### COMPONENT 6 Implementation of Integrated Safety Management

Implementation involves specific instances of work definition and planning, hazards identifications and analysis, definition and implementation of hazard controls, performance of work, developing and implementing operating procedures, and monitoring and assessing performance for improvement.

DOE P 450.4 10-15-96

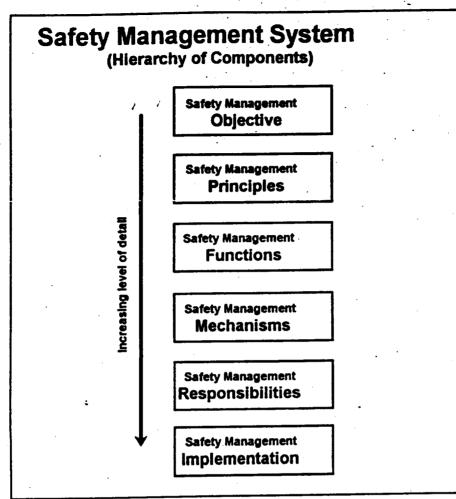


Figure 1



HAZEL R. O'LEARY Secretary of Energy

## SAFETY MANAGEMENT IMPLEMENTATION TEAM

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