

The Secretary of Energy

Washington, DC 20585

August 8, 2001

The Honorable John T. Conway Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, NW Washington, D.C. 20004

Dear Mr. Chairman:

Enclosed is the Department's response to your letter regarding follow-up questions from the February 2001 public meetings on Integrated Safety Management (ISM). The information you requested is provided as follows:

- Responses to General Follow-up Questions (Enclosure 1)
- Line Management Chain for the National Nuclear Security Agency (Enclosure 2)
- Line Management Chain for Environmental Management (Enclosure 3)

We appreciate your continued interest in Integrated Safety Management and agree that clear roles and responsibilities are essential for the continued implementation and improvement of this key program. The most recent revision to the Department's Functions, Responsibilities, and Authorities Manual (DOE Manual 411.1-1B) was issued on May 22, 2001. This Manual outlines the corporate-level functions, responsibilities, and authorities for Department of Energy (DOE) organizations responsible for the overall direction of ISM systems throughout the DOE complex. However, this Manual will be revised to reflect changes that I have made to improve the Department's management structure and reporting relationships once these changes are complete. We are committed to maintaining the validity and usefulness of this Manual and welcome any comments you may have to improve its effectiveness.

For questions regarding our line management chain, please contact me or have your staff contact Mr. James Mangeno of the National Nuclear Security Administration, or Mr. James Owendoff of the Office of Environmental Management. Questions on our Integrated Safety Management program should be directed to Mr. Ted Wyka at (202) 586-3519.

Sincerely,

Spencer Abraham

Enclosure 1

Board Questions and Department Responses from the February 13 and 22, 2001

Public Meetings on Integrated Safety Management

- Q. What has been done to capture lessons learned from the sites' Annual Integrated Safety Management Update Process?
- A. The first step is for the sites to complete a critical review of ISM implementation to determine where improvements to ISM systems are needed. The Department has provided ample guidance to assist field sites in performing their annual ISM reviews. Chapter IV of the Integrated Safety Management Guide (DOE G 450.4-1B) provides clear expectations on what these annual reviews should accomplish. These expectations and guidance were reiterated by the Deputy Secretary in a September 28, 2000, memorandum. DOE Contracting Officers are responsible for determining annually whether their contractor's ISM systems and system requirements (i.e., ISM system descriptions, lists of applicable directives, and authorization agreements) are current, valid and appropriately reflected in the implementation procedures and practices. Further, DOE field and headquarters elements are responsible for maintaining the currency and validity of their own ISM infrastructure.

Once lessons have been identified via the annual ISM update process, the sharing of the lessons learned across sites is necessary for Department-wide improvement. A primary means for sharing this information is by posting the results, including the areas for improvement and noteworthy practices, via the Internet. In addition to posting lessons on the Internet, the Department is planning a DOE-wide ISM Workshop for December 2001 with the primary object of discussing lessons learned from these annual ISM updates. Ultimately, lessons learned from annual updates are distilled and institutionalized in future revisions of the Department's ISM Guide.

Specific actions being taken by National Nuclear Security Administration (NNSA) and Environmental Management (EM) are described below:

National Nuclear Security Administration

Annual Integrated Safety Management Updates have just begun at NNSA sites. Sandia National Laboratory has recently completed its first one. The Kirtland Area Office is reviewing Sandia's Update for approval. Lawrence Livermore National Laboratory has an update scheduled for September 2001 and the Pantex Plant update is scheduled for October 2001. NNSA

headquarters will also review completed updates and ensure lessons learned are promulgated throughout the complex.

Environmental Management

Environmental Management sites for which the Assistant Secretary for EM (ASEM) is the designated Lead Program Secretarial Officer (LPSO) identify Lessons Learned in <u>every</u> report generated for Integrated Safety Management assessments, evaluations, and verifications. The methods employed in follow-up by the sites tend to vary, to some degree, based on site-specific requirements and procedures. Some sites use formal processes to document corrective actions (when warranted) resulting from these lessons. The actions are then tracked to completion in tracking systems established for that purpose. Others use less formal processes that incorporate the lessons into specific requirements documents used for future assessments, evaluations, and/or verifications. In either case, all documented 'lessons learned' from the annual update process are addressed by <u>all EM</u> sites.

Reports from EM sites are as follows:

Carlsbad Field Office/Waste Isolation Pilot Plant (WIPP)

Lessons Learned are captured through the use of monitoring tools, assessment of the criteria of the DOE Voluntary Protection Program (VPP), evaluation of the criteria in the DOE ISM process, safety effectiveness perception surveys, management commitment statements, and periodic evaluations of the effectiveness of the safety committee. The monitoring tools referenced above include performance indicators, incident investigations, audit close out actions, special evaluations, employee concerns and resolution of safety issues, and employee turnover statistics. Perceptions of WIPP safety effectiveness are gathered through periodic employee interviews and a formal employee survey. WIPP is a VPP STAR site.

• <u>Idaho Operations Office/Idaho National Engineering and Environmental Laboratory (INEEL)</u>

The lessons learned process has undergone a significant upgrade to support the feedback and improvement function of the ISM system. The process previously focused on information provided by external sources. The process was upgraded during the current fiscal year to include information from both internal and external sources and include effective inclusion of lessons learned into the corporate culture. The improved process includes receiving, reviewing, and disseminating to appropriate subject matter experts (SME) the lessons learned information from all

sources. Evaluations are performed by company-level functional area and site area SMEs. When corrective actions are required, the company-level SME is responsible for generic or site wide issues. The site area SME is responsible for site specific actions. Also, each site area has a designated lessons learned coordinator as local point of contact. Lessons Learned information is supplied to the coordinators from a central Lessons Learned Program Office. The development, communication, and use of lessons learned information is included as an element of employee job descriptions. An electronic database (Lessons Learned Management System) is maintained by the program office and is accessible through the company Intranet. In addition to mere numbers, trend data is also available from the system.

Other mechanisms have been employed for effective Lessons Learned. These include the adoption of the facility Evaluation Board (FEB) process and the recent acquisition of VPP STAR status at INEEL. Both DOE-ID and BBWI identified a need for a more formalized Annual ISM system update process to make it a more disciplined, timely and complete annual review. Work on this enhancement is presently in process.

• Hanford Sites/Richland Operations Office and Office of River Protection

Richland Operations Office (RL) contractors routinely conduct management and independent assessments of their management processes. DOE-RL provides for oversight of these activities consistent with DOE Policy P 450.5. Results from these and other assessments and feedback mechanisms, including Facility Representatives Surveillance's, RL Assessments/Surveillance's, Stop Work Events, Near Miss Events, Occurrence Reports, Employee Concerns, and Post Job Reviews are used to determine the need to modify the approved ISM System Description and/or implementing mechanisms. The ISM DEAR clause requires contractors submit revised safety performance objectives, performance measures, and commitments consistent with and in response to RL program and budget execution guidance and direction. This leads to discussions of projected major changes to approved systems and implementing mechanisms and results in entries into both the contractor and RL Lessons Learned processes.

The Office of River Protection (RP) enumerates specifically:

• Institution of a quarterly ISM system assessment process where the DOE ISM System Coordinator partners with one facility representative and selects a core function for evaluation of effective implementation at the tank farm. Two such evaluations have been completed thus far.

- Assignment of a code that reflects one or more of the ISM core functions (or guiding principles) to each finding that facility representatives identify in their monthly reports. These are then collected/trended to determine the status of implementation at tank farms.
- Identified a need for strengthening the feedback and continuous improvement function at both tank farms and within RP. Post job reviews are still inadequately accomplished and key oversight areas require improvement. The Activity Job Hazard Analyses are accomplished consistently but the hazard controls are not consistently incorporated into the body of the work package.

During the ongoing Annual review and update process, the results of the recently completed Independent Oversight Focused Review will be included with the above sources to enhance lessons learned. Many of the tank farm lessons learned are being used to formulate an effective ISM System for the Waste Treatment Plant contractor.

• Ohio Operations Office (OH)/Mound, Fernald, and West Valley

The scope and text of Lessons Learned from each of the initial Verification reports are as reported to the LPSO and the Board prior to the OH declaration of implementation per the Secretarial directive. In addition, West Valley Demonstration Project conducted two annual updates with the following process insights:

- Prior to report generation, team members required a more thorough briefing/familiarity with report formats.
- Within the documented Criteria and Approach Document reports, imbedded references to other sections of the report were easily overlooked. Cross-references were found more easily tracked when included in Criteria and Approach Document Criteria sections.
- A contractor requirement was added to submit an overview of proposed changes/enhancements to the ISM System, activity changes, and organizational changes since the previous review as part of their initial presentation.

The first annual update at the Fernald Environmental Management Project finds the report still in draft such that lessons learned are not yet published. The Miamisburg Environmental Management Project annual update has not yet taken place. However, OH has a lessons learned program implemented at all sites that incorporate all reports.

• Rocky Flats Field Office (RFFO)/Rocky Flats Environmental Technology Site (RFETS)

These lessons learned were developed during the conduct of the ISM System Update Assessment at the RFETS during the period of February 12-23, 2001. This assessment looked at RFFO, Kaiser-Hill (K-H) Corporate, and K-H floor level activities. Most of the lessons are of a general nature and are expected to be of benefit across the complex as ISM system assessments are planned and conducted. These lessons learned are presented based on the assumption that ISM team members are experienced in performing assessments or receive the appropriate training prior to participating on the ISM team.

- It is important that the team has objectivity, and therefore it is recommended that the sub-team leads be from other Department sites or from Headquarters. It is also beneficial if several assessors are from other sites as well.
- It was noted during the summary review process that a weakness in one Continuing Core Expectation (CCE) leads to a cascading of weaknesses through other CCEs. A suggested organizational approach for future annual reviews would be to group expectations in the following manner in order to eliminate perceived multiple failures to one weakness:
 - Performance Objectives and Measures
 - Balanced Priorities
 - Feedback and Improvement
 - System Description Update
- Document availability prior to the team's start would have allowed the team members to familiarize themselves with the contractor's processes and develop focused lines of inquiry.
- Contractor preparation can be weak or ineffective without organizational meetings and/or transmittal of the CCEs along with the criterion and expectations for the review. This would yield better results.
- The actual assessment should be scheduled for two weeks with another 3-4 days for writing the report. Team meetings are essential to the success of the verification.
- A team meeting at the end of every day is useful for the team to holistically understand where it is. A summary review of all

issues/findings is imperative to have an objective roll-up of the issues/findings.

• Savannah River Operations Office (SR)/Savannah River Site (SRS)

Lessons learned from the results of having conducted annual updates are fed back into revisions to enhance implementing mechanisms. These include procedures, contracts and agreement mechanisms, such as the annual operating plan (AOP). Lessons learned from the Annual ISM Management Evaluation are used by the ISM Executive Steering committee to formulate new strategic improvement planning initiatives documented in the ISM Strategic plan. The ISM Executive steering Committee assigns responsibilities for implementing the strategic initiatives in an action plan which the committee tracks to closure

At SR, there is a three-year history of using and enhancing the Annual ISM Management evaluation that is part of the update process. There is a four-year history with other parts to continue to improve the update process. As an example, the lesson applied after the first issue of the ISM System Description Document was that the document was placed in the front of the Standards/Requirements Identification Document (S/RID) to help streamline and ensure the correct approval process and approval authority is used in each successive year. Also, steps were taken to ensure that the Westinghouse Savannah River Corporation (WSRC) ISM Executive Steering Committee is in the approval chain for the ISM System Description.

- Q. A finding from the 98-1 implementation verification was the need to link the Corrective Action Management Systems with lessons learned. What steps have been taken to address this issue?
- A. Lessons learned is an integral part of ISM and the Corrective Action Management (CAM) Team has worked closely with the Director of the Safety Management Implementation Team (SMIT) to use the ISM communication structure to stress the importance of lessons learned throughout the DOE complex. This was a major theme of the December 2000 Integrated Safety Management Workshop and the SMIT Director has stated that the Lessons Learned programs will again be a major theme of the 2001 ISM Workshop.

Process guidance for linking lessons learned into the Corrective Action Management Program has been incorporated in DOE Guide 450.4-1B, Volume 2, Integrated Safety Management System Guide. The DOE Guide outlines responsibilities and sources for identifying and incorporating lessons learned in response to identified safety issues.

- Paragraph 2.2, Appendix G outlines specific sources of lessons learned that include DOE line management assessments, DOE independent oversight assessments, and accident investigation reports.
- Paragraph 4.2.2, Appendix states cognizant secretarial officers should implement lessons learned programs and participate in DOE-wide sharing of lessons learned in responding to safety issues identified by the Office of Environment, Safety and Health Oversight (EH-2) and Office of Independent Oversight and Performance Assurance (OA-1). Lessons learned should be developed for each safety issue, distributed locally and submitted to the DOE Lessons Learned Program. The lessons learned should also to be addressed in the corrective action(s) developed by the cognizant line manager to address each safety issue.

Paragraph 9.6 of the revised DOE Manual 411.1-1B, Safety Management Functions, Responsibilities, and Authorities Manual (FRAM) addresses cognizant line manager responsibilities to develop, implement and participate in DOE-wide sharing of lessons learned to include CAM Program corrective actions for identified safety issues.

- Q. What is the status of all sites capturing the 98-1 process in their implementing procedures and effectively implementing them across all programs? What mechanisms are in place to ensure the timely and reporting of all corrective actions?
- A. The revised DOE ISM Guide (DOE G 450.4-1B) and FRAM (DOE M 411.1-1B) outline the responsibilities and requirements of Headquarters and field element offices in implementing the CAM Program. The SMIT Director has monitored incorporation of CAM Program responsibilities and requirements in program secretarial office and field element management functions, responsibilities, and authorities (FRA) documents. However, the FRAM and program and field office FRA documents will need to be revised, as appropriate, to reflect changes made by the Secretary to the Department's management structure once these changes are complete.

All FRAs have been revised and published incorporating local implementation of Corrective Action Management Program guidance with the exception of:

- the Office of Environment, Safety and Health (EH) and
- the National Nuclear Security Administration (NNSA).

Both organizations have developed revised FRAs but have not yet approved or implemented them.

Numerous initiatives have been implemented by the CAM Team to ensure the timely completion and reporting of corrective actions by line managers in response to identified safety issues. These initiatives include:

- The Office of Independent Oversight implemented a formalized system of electronically notifying the applicable Program Secretarial Officers (PSO), operations/field offices, and CAM site representatives of late corrective action plans (CAPs) and CAPs with corrective actions open past the planned CAP completion date. These notifications are sent the day following the completion due date and every 30 days after until reported complete or a revised completion date has been approved by the PSO. Line management responses and follow-up to these notifications have been outstanding. In several instances the corrective actions were completed but the information had not been properly annotated in the Corrective Action Tracking System (CATS). This has resulted in increased interaction by site line management with site CATS users.
- The Office of Independent Oversight implemented several changes to the DOE Corrective Action Management Program quarterly report, which more accurately reflect the status of the program. This includes additional explanation and clarification of information contained in the report, inclusion of line management explanation for late CAPs and corrective actions open past the planned CAP completion date, and revision of the report graphics to better illustrate the overall status of corrective actions.
- The CAM Team has maintained continuous dialogue and aggressive follow-up on individual and DOE-wide CAM Program activities. The CAM Team, sponsored by the Deputy Assistant Secretary, Office of Oversight of Environment, Safety and Health, has continued to closely monitor and assist line managers in effectively completing and reporting corrective actions. The CAM Team, which include the SMIT Director, representatives from program secretarial offices and field element managers, are kept fully informed and actively participate in all aspects of the program.
- The Office of Independent Oversight added the status of the Corrective Action Management Program in his scheduled quarterly meetings with each Program Secretarial Officer.
- The Office of EH Information Management (EH-71) monitors the status of the CATS and provides technical assistance to the CAM Team and line representatives. EH-71 has recently updated the CATS Users Guide and CATS Data Dictionary, and provided training to CATS users. As a result, the timeliness and accuracy by line representatives in reporting corrective actions have improved. EH-71 also revamped the CATS database to accommodate various enhancement discussed above.

The Office of Independent Oversight has also increased on site follow-up reviews of selected and all corrective actions to previously identified safety issues in conjunction with scheduled appraisals at various sites, and conducted appraisals specifically designed to follow-up results of all corrective actions to previously identified safety issues. This has provided the opportunity for on site evaluations to determine the effectiveness of the corrective actions in resolving these safety issues.

- Q. In December 2000, the *report Initial Joint Review of Wildland Fire Safety at DOE Sites*, was submitted to the Secretary of Energy. On January 19, 2001, the Secretary issued a memorandum titled "Wildland Fire Safety Enhancements," to Program Secretarial Officers, DOE Operations Office Managers and DOE Field Office Managers, directing them to develop implementation plans for all actions within 60days. Are the corrective action plans being completed, and are findings being tracked to closure in accordance with the formal process established in the DOE directives system in response to recommendation 98-1? If not, what process is being used and what was the basis for not using the established DOE process?
- A. Program Secretarial Officers and Operations and Field Office managers have developed and submitted implementation plans in response to the recommended opportunities for improvement listed in the December 2000 report, *Initial Joint Review of Wildland Fire Safety at DOE Sites*. These plans have been reviewed by the Office of Environment, Safety and Health Oversight and Office of Independent Oversight and Performance Assurance.

Several of the completed cognizant line manager reviews have identified and listed corrective actions in response to the recommended opportunities for improvement. These include deliverables, responsible individuals and planned completion dates. None of these improvement items have been considered safety issues. Corrective actions are being tracked and reported to closure using local tracking systems.

If a safety issue is identified by cognizant line managers during conduct of the wildland fire reviews or self-assessments, exercises, or other follow-up reviews, the Office of Independent Oversight and Performance Assurance will maintain coordination with the applicable Program Secretarial Officer and cognizant line manager to ensure that a timely and accurate corrective action plan is developed and implemented within the purview of the Safety Issue Corrective Action Process outlined in DOE Order 414.1A, Quality Assurance. If it is determined that a sufficient number of safety issues are identified and need to be tracked in the CATS, a request for adding these safety issues in CATS will be submitted in writing to the Office of the Secretary in accordance with the criteria for using the CATS outlined in the

February 15, 2001 DOE memorandum *Corrective Action Tracking System* issued by the Director, Safety Management Implementation Team.

Independent Oversight formal reviews of fire safety programs and emergency response systems outlined in the May 2001 *Evaluation Plan* have commenced. Any safety issues identified during the conduct of these and other fire safety reviews by Independent Oversight will be reported and corrected in accordance with DOE Order 414.1A and tracked in the DOE CATS.

- Q. Please describe the value of currently used Performance Indicators in assessing the state of your programs. What other performance indicators do you use to assist in measuring effectiveness and/or safety in your programs? What other performance indicators would you suggest that could be useful to you?
- A. On December 3, 1999, the Deputy Secretary established the following measures as the initial set of ISM performance measures:
 - Total Recordable Case Rate
 - Occupational Safety and Health Cost Index
 - Reportable Occurrences of Releases to the Environment
 - Estimated Radiation Doses to the Public
 - Worker Radiation Dose

The objective of the corporate set of ISM performance measures is to allow managers to determine whether the ISM objective of "doing work safety" is being achieved.

Since December 1999, four performance measures reports have been issued. These reports provide multiple views for each performance measure: 1) DOE-wide performance trend, 2) relative contribution by the PSO to the current DOE-wide performance, and 3) current performance by the PSO compared to historical performance. Department-wide performance is shown on a control chart, a statistical tool that allows users to view data and determine it there have been any significant system changes effecting the results during the time interval reported.

It is still too soon or of limited value to draw conclusions concerning ISM effectiveness at DOE sites based solely on the five performance measures. These performance measures, along with other possible measures, need to be trended over time to determine the degree of improvement. Because most of these data are available quarterly or annually, it is expected to take several years before trends are evident.

In addition, it is clear that additional evolution needs to occur on the set of measures as well as how they are being used. This was recognized at the outset. The SMIT Director formed a Performance Measures Working Group (PMWG) with members from the program offices, field offices, and selected contractor groups to refine these measures and evaluate additional measures. The PMWG is considering other possible performance measures in the areas of productivity, environmental/pollution prevention, effectiveness of event corrective action, and lost work day case rate. The results of this effort will be worked through the Department's Field Management Council.

Experience with performance measures indicates that development and effective use of a mature set of measures requires a multiple year commitment. The set of ISM performance measures and the presentation of this information is expected to continue to evolve as experienced is gained.

Specific inputs are provided below from the National Nuclear Security Administration and Office of Environmental Management.

National Nuclear Security Administration

Currently used performance indicators are useful in assessing the state of NNSA programs. However, they have one weakness. They are very useful indicators of "*Safety*", but they are not as useful in measuring "**Do Work Safely**," the objective of Integrated Safety Management.

NNSA is developing measures of performance of NNSA sites in key areas such as Authorization Basis, Criticality Safety, Radiation Protection, etc. These measures are the consensus opinion of headquarters subject matter experts in the Defense Program's Office of Technical Support. Senior line management reviews the measures. The measures are also discussed with the Administrator on a quarterly basis.

NNSA is investigating the use of contractor performance evaluations and laboratory appraisals as a performance measure of "Do Work Safely." Work done to date indicates that there may be merit in tracking evaluations and appraisals as a performance measure.

Environmental Management

The Office of Environmental Management instituted the use of "Site Safety Profiles" (SSP) in December 1999 to assist in fulfilling the Headquarters management roles and responsibilities in implementing DOE Policy 450.5, *Line Environmental, Safety, and Health Oversight*. The SSPs provide an overview of safety performance, emerging issues, and corrective measures at the sites. They are formulated from myriad data sources, including performance indicators such as the Total Recordable Case Rate (TRC) and the

Lost Workday Case Rate (LWC), OSH Cost Index, and overdue corrective actions from CATS, NTS, ORPS, and other DOE databases. Line and staff managers in EM use the SSPs to assess the relative performance (improvement/declining performance) of a specific site. They are not used to compare one site with another, although some competition between sites may result from such comparisons. The SSPs were produced monthly from December 1999 to November 2000. They are now produced quarterly, augmented with a monthly, "Safety Summary."

This method of assessing safety at EM sites with performance indicators has proven to be very successful. For example, since the March 2000 SSPs were issued, the number of management (red) alerts reported in the SSPs has dropped from 14 to 1, a reduction of over 90%. Since December 2000, EM has reduced overdue CATS items by 98%.

EM's improved safety performance record is exemplified by the following statistics. This data is particularly noteworthy as EM maintained an improving trend in worker safety in spite of increasingly hazardous work.

	1999	2000 YT	2001 ΓD (June)
DOE Average TRC	2.7	2.5	2.3
EM Average TRC	2.3	2.1	1.9
DOE Average LWC	1.3	1.1	1.0
EM Average LWC	1.1	0.9	0.9
DOE Average OSH Cost Index	16.2	11.7	8.6
EM Average Cost Index	13.6	7.1	5.2

EM also provides a summary of Workplace Injury and Illness Rates in the Monthly Management Review (MMR) provided to the Deputy Secretary on a monthly basis. This provides a quick comparison of how each of the EM sites is performing compared to industry averages, EM averages, and the site's performance from last fiscal year on Total Recordable Case Rate and the OSH Cost Index. The MMR also provides a summary of commitments to the Defense Nuclear Facilities Safety Board (DNFSB) from Letter Report Requirements and Recommendation Implementation Plans that are complete, overdue, and due within the next 3 months.

EM is not currently contemplating the tracking and reporting of any additional performance indicators on the SSPs. However, EM is assisting the Department in identifying alternative performance indicators, and could easily add any additional indicators to the information in the SSPs if the Department recommends or directs any changes to the safety performance indicators

currently used. Environmental management is amenable to improvement in this area, is open to suggestion and review comments from all sources, and is receptive to the use of new/additional indicators, if they can be demonstrated to be beneficial. The Safety & Health Committee of the Environmental Management Advisory Board (EMAB) has recently began to evaluate potential "leading" indicators. The EM Office of Safety, Health and Security (EM-5) is working closely with the EMAB in this endeavor.

Enclosure 2

Line Management in the National Nuclear Security Administration

Line management responsibility in the National Nuclear Security Administration (NNSA) flows directly from the Administrator to the Associate Administrator for Facilities and Operations to the Field Element Managers (FEM). From the FEM, line responsibility extends to contractor management. The attached Organization Charts for the NNSA depict these relationships. The following are specific references to DOE directives affirming this organizational description.

DOE Manual 411.1-1B, Functions, Responsibilities, and Authorities Manual (May 2001)

DOE Manual 411.1-1B states that "DOE line management flows from the Secretary through the program offices to the field element and then to management and operating contractors." This manual will be revised to reflect recent changes made by the Secretary to the Department's management structure once these changes are complete.

NNSA has not finalized and formalized its reporting structure within a Functions, Responsibilities and Authorities Manual.

Enclosure 3

Line Management in the Office of Environmental Management

Line Management in the Office of the Environmental Management (EM) flows directly from the Assistant Secretary of Environmental Management (ASEM)/ Principal Deputy Assistant Secretary to the Field Element Managers (FEM) for which the ASEM is designated as Lead Program Secretarial Officer. From the FEM, the Line extends to contractor management through the CEO to Program Managers and workers. The attached Organization Chart for the Office of Environmental Management (Figure 1) represents the flow of line management for ES&H. The following are specific references to DOE directives affirming this organizational description.

From Section 5, Overview of Departmental Safety Management, in DOE M 411.1-1B (May 2001)

DOE Manual 411.1-1B states that "DOE line management flows from the Secretary through the program offices to the field element and then to management and operating contractors." This manual will be revised to reflect changes made by the Secretary to the Department's management structure once these changes are complete. The Under Secretary for Energy, Science and Environment will have direct line management responsibility for the Office of Environmental Management.

"In those cases in which a program-specific facility or laboratory is present on a site, a single PSO is assigned as the cognizant secretarial office (CSO) for that facility or laboratory and is accountable for the environment, safety, and health (ES&H) within its confines."

"The CSO usually delegates operating authority of an installation/facility to the FEM, who has direct responsibility for day-to-day control. Delegation of safety authority to the FEM does not relieve the CSO for responsibility for safety."

From EM FRAM (April 2000)

5.0 INTERFACES

The EM line organization consists of a direct line extending from the Secretary to the Office of the Assistant Secretary for Environmental Management (which includes the Principal Deputy Assistant Secretary and the Director of Site Operations), then to the FEMs, to the heads of the contractor organization, and finally to the individuals performing the work.

EM Deputy Assistant Secretaries (DASs) are accountable for safety in their areas of responsibility and report directly to the Office of the Assistant Secretary for EM. DASs will be knowledgeable and aware of the safety status of their sites and promptly act on problems jeopardizing or which have the potential to jeopardize the safety and health of the workers, the surrounding population and/or the environment. In response to such problems, DASs will employ the powers and authority vested in them to facilitate corrective action at the sites.

5.1 EM Headquarters and Field Elements

For dedicated program-specific facilities, where EM is the only PSO, EM is assigned as the Cognizant Secretarial Officer (CSO) for that facility or laboratory and is accountable for the ES&H within its confines (DOE M 411.1-1B).

For facilities where EM is the CSO, it has generally delegated operating authority for its installations/facilities to the FEMs, who have direct authority for day-to-day control. Delegation of safety authority to the FEMs does not relieve the EM of responsibility for safety. EM is responsible for providing the direction and oversight necessary to ensure that missions are performed safely and within budget.





