



Department of Energy

Washington, DC 20585

January 14, 2003

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

Consistent with the Department of Energy's Quality Assurance Improvement Plan (QAIP) for Defense Nuclear Facilities, I am forwarding a copy of the Environmental Management memorandum "Submittal of Annual Integrated Safety Management System Declarations" dated December 19, 2002. This memorandum satisfies commitment 16 of the QAIP for Environmental Management direction to revise budget protocols to require annual declaration from EM Field/Operations Offices and Contractors on ISM.

If you have further questions, please call me at (202) 586-7709 or Mr. Paul Golan, Chief Operating Officer, Environmental Management, at (202) 586-0738.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jessie Hill Roberson".

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure

cc: Mark Whitaker, S-3.1





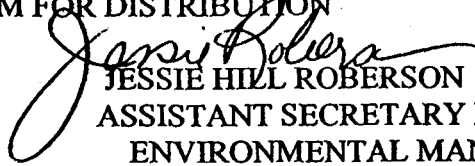
Department of Energy

Washington, DC 20585

December 19, 2002

MEMORANDUM FOR DISTRIBUTION

FROM:


JESSIE HILL ROBERSON
ASSISTANT SECRETARY FOR
ENVIRONMENTAL MANAGEMENT

SUBJECT:

Submittal of Annual Integrated Safety Management
System Declarations

The purpose of this memorandum is to request the submission of an annual Integrated Safety Management System (ISMS) Declaration letter for calendar year 2002 to me by January 31, 2003, for Field/Operations Offices and its contractors. After this, a declaration will be required on an annual fiscal year basis to document implementation changes, effectiveness, and improvement. As part of the Department's Quality Assurance Improvement Plan for Defense Nuclear Facilities, the Office of Environmental Management (EM) has committed to maintaining ISMS by approving annual revisions (Department of Energy (DOE) and Contractor) or approving a basis for no annual revision, and establishing schedules for revisions and re-verifications (DOE and Contractor) to approve changes in ISMS. Additionally, EM committed to include an annual ISMS declaration from Field/Operations Office Managers as part of its annual budget evaluation process.

In order to meet these commitments, it is expected that you provide the details of how the ISMS has been maintained for both you and your contractors since the initial ISMS declaration was made for your site. Please provide the dates for all ISMS revisions and re-verifications (DOE and contractor). Where annual revisions were made but no formal re-verification occurred, provide the basis for your determination that performing a re-verification was not required. The declaration means that at your site, Integrated Safety Management (ISM) is fully implemented, maintained, and functioning in an effective manner. For instance where a declaration cannot be made, a DOE Field/Operations Office approved corrective action plan must be submitted. In addition, for contractor activities a determination for how safety will be maintained must be provided.

Attached is information to be used by the DOE Field/Operations Offices to better understand what types of elements would be appropriate in a DOE ISM Program.



In the future, ISMS Declaration letters shall be submitted by September 30, of each fiscal year, in support of the budget evaluation process. The ISMS Declaration letters must identify any revisions, schedule for revisions, schedule for re-verification, and if no revision and/or re-verification are necessary, provide justification for such determination.

If you have any questions concerning this request please call Ms. Sandra Johnson at (202) 586-0755.

Attachment

Distribution:

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cc: Robert G. Card, S-3
Tyler Przybylek, Acting Chief Operating Officer, NA-1
Milton Johnson, Chief Operating Officer, SC-3
Paul M. Golan, Chief Operating Officer, EM-3
Sandra Johnson, Director, EM-5
Roger Butler, Deputy Assistant Secretary, EM-10
Patrice M. Bubar, Associate Deputy Assistant Secretary, EM-20
Mark Frei, Deputy Assistant Secretary, EM-30
Mark Frei, Acting Deputy Assistant Secretary, EM-40

Declaration Goal: ISMS are in place, fully implemented, maintained and effective, providing the necessary structure and confidence that ISM will continue to improve.

- 1) Line Manager, based on requirements, establish clear roles & responsibilities (R&Rs).
- 2) FRAM, QA Program, and an Integrated Requirements management process.
- 3) Develop and establish policies and procedures that have clear R&Rs, are usable, quality, etc.
- 4) Perform training on individual R&Rs, as promulgated by policies and procedures.
- 5) Evaluating implementation effectiveness and using feedback mechanisms to drive improvement

* Note: R&Rs will be used to encompass authorities, delegations, requirements and roles and responsibilities.

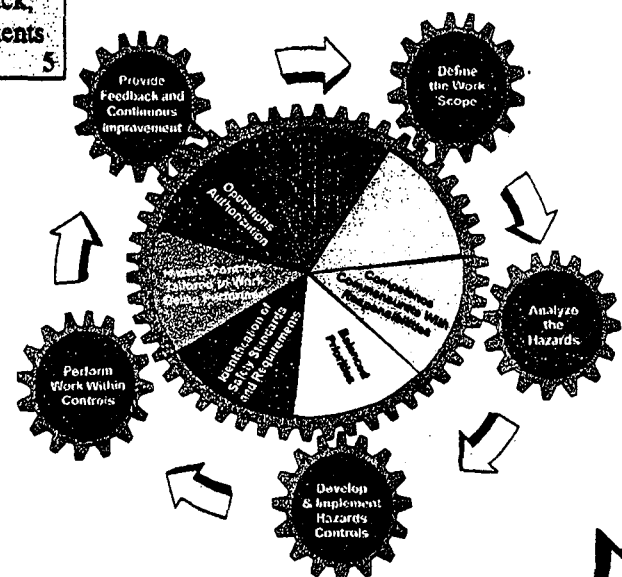
- A) Implement DOE P450.5, Oversight (Procedures, Train staff, Develop Annual Assessment Plan, annual report to line manager as to performance against plan, results, and risk associated with the portion of the plan that wasn't met.)
- B) DOE Self Assessment (Procedure, train staff, Annual Assessment Plan, findings/reports, annual report as to DOE effectiveness.)
- C) Corrective Action Management Program, Tracking and Closure Verification
- D) Track, monitor & evaluate performance of DOE & Contractor.
- E) Identify Feedback and Improvement mechanisms
- F) Establish DOE performance metrics

Note: Turn Data into information to support risk based decision making to drive improvement

Assess Performance, Provide Feedback, Make Improvements 5

Establish Line Manager Authorities, Delegations, Roles and Responsibilities 1

- Integrate Requirements
Establish Requirements Management Process
- | | |
|---------------------------------|------------------------|
| <u>DOE</u> | <u>Contractor</u> |
| •HQ FRAM | •Contract Deliverables |
| •Directives | •Requirement Lists |
| •Federal Regs. | •AAs |
| •Authorization Agreements (AAs) | |



Line Manager Delegates R&Rs to Assistant Managers (AMs) and staff 2

- A) Field FRAM
- B) Prioritize R&Rs to focus on Risk
- C) Quality Program Description
- D) Contract Management Plan
- E) Establish Performance Incentives

IMPLEMENTATION 4

- A) Train staff on their R&Rs relative to the policies & procedures Lead Org. developed to implement Line Managers R&Rs.
- B) Clear Management expectations for all employees to use policies & procedures to perform work.
- C) Train staff on Change Control process to promote continuous improvement.

Promulgate R&Rs through formal implementing protocols (i.e., policies and procedures) 3

- Protocols must be requirements based, high quality, clearly define R&Rs, and usable in a timely manner.
- Documented management decision making as to which R&Rs require implementing documents
- Structure for implementing documents to be created consistently
- Procedures Required:
 - a) Procedure for Requirements Mgmt. (DOE & Contractor)
 - b) Procedure for FRAM and its configurations mgmt.
 - c) Procedures to develop & maintain policies & procedures.
 - d) Procedure for Change Control (contract and Implementing Doc.)
 - e) Procedures for training and implementation.
 - f) Policies & Procedures developed to promulgate and implement Line Managers R&Rs, as identified in 1 & 2 above.