



Department of Energy

Washington, DC 20585

May 8, 2003

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

The purpose of this letter is to provide the Defense Nuclear Facilities Safety Board (Board) with the status of the Quality Assurance Improvement Plan (QAIP), and to report completion of deliverables 1.5 and 1.5.1.

In December 2002, I directed Environmental Management sites to submit Integrated Safety Management System (ISMS) declarations annually with their budget request. EM received all site declarations for the current cycle in February 2003, and recently completed an assessment of those declarations. While EM sites met the literal requirements of ISMS, it was clear through our assessment that ISMS was not being effectively used to *improve safety*. In April 2003, the sites were directed to re-evaluate their ISMS declarations discussing how ISMS was being used to improve safety performance. A copy of that correspondence is attached.

While EM has made progress in fully and effectively implementing ISMS, it is clear that more work needs to be done. While these actions complete QAIP deliverable 1.5 and 1.5.1, EM will use the tools of the QAIP, including the integrated assessment process, to ensure ISMS implementation continues to improve safety and become more relevant. If you have any further questions, please call me or Mr. Paul Golan at (202) 586-0738.

Sincerely,

A handwritten signature in cursive script that reads "Jessie Hill Roberson".

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure

cc: Mark Whitaker, DR-1 ✓



memorandum

DATE: APR 07 2003

REPLY TO:

ATTN OF: EM-3

SUBJECT: Integrated Safety Management Program Declarations

TO: Distribution

The purpose of this memorandum is to provide you feedback on Integrated Safety Management (ISM) program declarations that you recently provided at the request of the Assistant Secretary. The responses generally seem to indicate a systematic compliance mindset, which would have been acceptable 2 years ago. However, my expectation is that we are now striving to build "thinking systems" that understand and predict behaviors during work performance. I am requesting you resubmit your ISM program declaration using a different approach, described below.

The purpose of the ISM program is to improve safety performance; that means we do work and do it safely. For an ISM program to be effectively implemented, you should be able to answer the following questions:

1. What are the important indicators, relative to safety performance, that you are measuring.
2. What are those indicators telling you about safety performance.
3. What have you done or what are you going to do with the data to improve safety performance, and
4. What work have you not done because analysis of the risk determined a safer course of action and how do you monitor these decisions.

I am requesting that you resubmit your ISM program declaration starting first with a discussion on the measurable indicators you use to monitor and assess safety performance. A discussion on what those indicators are telling you about safety performance would follow. If your indicators are telling you that safety performance is not improving, you should then evaluate and discuss what aspect(s) of your ISM program are not working, why it is not working, as well as what needs to be done in order to improve safety performance. If, on the other hand, safety performance is improving, you should ask what is causing it to improve and why. It is only when we know and understand both cause and effect that we really know.

Another point that I would like to highlight is **how do you know?** What are the independent, credible sources of information you, the contractor, and Federal staff use to give you confidence that your indicators are an accurate reflection of actual and is the contractual relationship continuing to reinforce improving site work performance. A good test to see if you are

susceptible to the condition known as having the blinders on is when data is presented that is contrary to your indicators, do you dismiss it as spurious (blinders on) or do you look at the new information credibly and thoroughly (blinders off)?

I am requesting that you complete a review of your ISM program by May 10, 2003. Again, the whole point of this program is to improve safety because it helps us achieve our goals.



Paul M. Golan
Chief Operating Officer
Office of Environmental Management

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