“EFCOG’s Knowledge Portal Review”
2011 Waste Management Symposium
DOE Directives Reform Initiative

Presented by

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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
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.
- STAY TUNED..........................