

FREQUENTLY ASKED QUESTIONS (ABOUT THE NEW ISM MANUAL)

Questions about Attachment 2

Q1: How important is Attachment 2?

A: Attachment 2 is very important to obtaining a full understanding of the vision for full ISM implementation, at multiple, interacting levels, from the enterprise-level to the site-level, from the facility-level to the activity-level. The Attachment states: “This Attachment provides the vision for DOE to achieve the essential attributes of a high-performing organization, and further improve the Department’s safety record and productivity record. This vision captures the elements needed for DOE to move beyond a compliance-based approach to a performance-based approach, consistent with more mature high-reliability organizations.”

Q2: How was Attachment 2 written?

A: Attachment 2 was initially drafted by a group of seven DOE headquarters federal employees and contractors, many of whom had field and operational experience, and several had experience in other related industries, including the nuclear navy, commercial nuclear power, and hazardous chemical processing. The group sought to integrate and incorporate several key sources of safety management insights, including previous ISM system guidance, the INPO safety culture standard, the research findings on High Reliability Organizations, the principles and knowledge base on Human Performance Improvement, and the findings of noted experts including Dr. James Reason and Dr. Edgar Schein. The attachment was then vetted through several knowledgeable groups of safety experts, including the DOE ISM champions and the EFCOG ISM working group. It was ultimately vetted several times through the Department’s directives review and comment process, including review by the Defense Nuclear Facilities Safety Board.

Q3: Why was Attachment 2 written?

A: Attachment 2 was written to help managers in revitalizing ISM implementation based on key learning about safety management over the past 10 years. Specifically, Attachment 2 was written to fully articulate the ISM guiding principles and to describe their role and relationship to DOE’s desired safety culture. In so doing, four additional safety culture elements were also identified that merited attention. Taken together, the ISM

principles and the supplemental safety culture elements are intended to describe the overall environment or context or culture within which ISM systems, processes, and mechanisms are most effectively implemented to achieve improvements in both safety and reliability. Attachment 2 is also intended to promote a shift from compliance toward excellence and continuous improvement.

Q4: Are DOE and contractors required to implement Attachment 2?

A: DOE and contractor elements are required to implement the ISM guiding principles. The requirement for DOE to implement the ISM guiding principles is contained in the new ISM Manual. The requirement for contractors to implement the ISM guiding principles is contained in the ISM DEAR clause (DEAR 48CFR970.5223-1, Integration of environment, safety, and health into work planning and execution). Attachment 2 of the ISM Manual provides authoritative guidance on what successful implementation looks like in terms of key observed behaviors. DOE elements are now required to establish DOE ISM system descriptions that address the guiding principles and must describe: "the ISM implementing mechanisms, processes and methods by which the Secretarial/field office implements the ISM guiding principles to create an effective environment for ISM implementation, as defined in Attachment 2." Contractors are not required to change their ISM system descriptions at this time. The attachment specifically states: "DOE contractors are not required to make any changes to their ISM Systems to address the supplemental safety culture elements."

Q5: What are the expectations for DOE and contractors regarding Attachment 2?

A: DOE and contractors responsible for ISM systems are expected to read and understand the contents of Attachment 2, and to look for the best ways to use these attributes and supplemental elements to improve their safety systems. As part of the process required by the new ISM manual, DOE and contractors will identify annual safety performance objectives, measures and commitments. Attachment 2 provides many avenues to focus future improvement activities based on current situations and needs. As part of initial implementation of the ISM manual, DOE elements are expected to consider the attributes and elements of Attachment 2 as part of their ISM system development.

Q6: How should DOE and contractors go about using Attachment 2?

A: The Attachment states: "The attributes may be used as performance indicators regarding how well an organization is implementing the ISM principles or supplementary safety culture elements. When used as performance indicators, reviews against the attributes should be used for diagnosis and improvement." Understanding the strengths and weaknesses of current implementation is an important first step. Selecting a focused set of improvement targets is the next step; it is important not to try to change or improve everything all at once, but rather focus on several key safety behaviors that need attention (3-5 focuses is a good target; no more than 5-7 focuses are recommended). Once identified and endorsed by local management, change strategies and action plans should be helpful in achieving the desired changes.

Q7: Will Attachment 2 be used for future DOE assessments?

A: The material in Attachment 2 is not appropriate for use in a "compliance assessment" or "performance evaluation." This material would be useful for a "diagnostic self-assessment" or an "improvement self-assessment" of implementation of the ISM guiding principles or supplemental safety culture elements. Attachment 2 specifically states: "The material in this Attachment is provided to clarify expectations for implementation of the ISM guiding principles and to describe supplemental safety culture elements. The attributes are not intended for use as assessment criteria. The attributes are intended for use as a management tool to help clarify expectations of organizations and employees." Misuse of Attachment 2 should be reported to cognizant DOE personnel.

General Questions

Q8: Will additional guidance be provided on when DOE considers that a full ISM verification is needed; that is, what are the trigger points for requiring an ISM verification?

A: Attachment 4, Section 5 provides six specific conditions when DOE may decide that a full ISM verification or re-verification is needed: (1) changes in leadership, including a new contractor; (2) changes in safety management approach; (3) changes in mission; (4) loss of confidence; (5) significant safety problem or poor performance; and (6) significant findings by independent or external review. DOE ISM system descriptions (required by the Manual) and/or DOE oversight plans (required by DOE 226.1) are expected to provide additional information on how DOE offices will implement this requirement.

Q9: With regard to the Annual ISM Declarations generated by the contractors and submitted to DOE, how much detail should be provided in these documents?

A: The purpose of this process is to reflect on past performance and generate a discussion with DOE site offices to identify where to improve. The goal is to encourage dialogue and the process of continuous improvement, not to have it be a writing exercise. DOE offices are expected to provide additional guidance on expectations to contractors.

Q10: Should 10CFR851 Worker Safety and Health Plans (which are enforceable) be separate from the ISM System Description which may contain best practices?

A: No, not necessarily. It is acceptable to describe Worker Safety and Health Plans as they relate to 10CFR851 separate from other elements of the ISM system description which contain unenforceable activities and processes.

Q11: Human Performance Improvement (HPI) concepts have been integrated into new ISM manual, particularly in Attachment 2. Will HPI be mandated by DOE in a new order?

A: DOE has no plans or intentions to mandate HPI or develop an HPI order. DOE encourages contractors to use HPI to improve safety and reliability. DOE considers HPI one of the most promising approaches that contractors can use to improve safety and reliability.

Q12: Who should I contact for further information?

A: Dr. Patricia Worthington (HS-10) is responsible for the new ISM manual. Her contact information is: 301/903-5392 (office phone) and patricia.worthington@hq.doe.gov (e-mail).

Dr. Chuan Wu (EM-3) is the DOE ISM Champion. His contact information is: 202/586-4166 (office phone), 202/577-1470 (cellular), and chuan-fu.wu@hq.doe.gov (e-mail).