

**The Under Secretary of Energy**

Washington, DC 20585

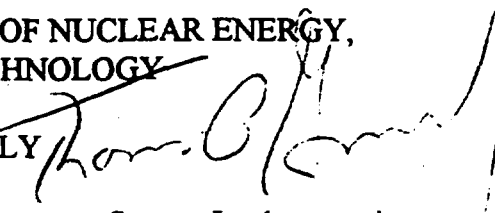
October 28, 1996

**MEMORANDUM FOR CHRISTINE A. ERVIN  
ASSISTANT SECRETARY FOR ENERGY EFFICIENCY  
AND RENEWABLE ENERGY**

**PATRICIA F. GODLEY  
ASSISTANT SECRETARY FOR FOSSIL ENERGY**

**MARTHA A. KREBS  
DIRECTOR, OFFICE OF ENERGY RESEARCH**

**TERRY R. LASH  
DIRECTOR, OFFICE OF NUCLEAR ENERGY,  
SCIENCE AND TECHNOLOGY**

**FROM: THOMAS P. GRUMBLY**   
**SUBJECT: Integrated Safety Management System Implementation at  
DOE Facilities**

The Secretary's approval of the Safety Management System Policy, DOE P 450.4, on October 15, 1996, (copy provided at Attachment 1) requires the Department to implement an integrated Safety Management System (SMS). The Secretary has directed several actions that will lead the Department to improved safety performance. These actions will result in better integration of work and safety, or simply put, will enhance our ability to "do work safely."

Over the past several months, under Frank McCoy's leadership of a Safety Management Implementation Team, there has been a concerted effort to develop policy and guidance for implementing an integrated Safety Management System at ten priority facilities that are under the aegis of Defense Programs (DP) and Environmental Management (EM). I recognize and appreciate the contributions and efforts of the staff personnel who represented your organization and worked with us to develop this SMS policy and guidance for the Department.

This effort has now progressed to the point where it is appropriate to commence implementation throughout the Department. The purpose of this memorandum is to ask you to help us progress the SMS effort within your areas of responsibility. Your help is needed in a variety of areas; however, as a first step, I request that you identify those facilities and laboratories where the SMS can be, is being, or has been implemented.

I recognize that many facilities have made significant progress and are already developing many of the necessary elements for an integrated Safety Management System. Some have committed to negotiate contract revisions that require SMS implementation and take into account factors that may impact their mission and budget, such as hazards to personnel, the public, the environment, and property. Furthermore, I recognize that the SMS must be flexible and tailored, must be based on the work and its associated hazards, and must be integrated jointly by the contractor and DOE at all levels of management.

A Safety Management "Lessons Learned" Workshop is scheduled for November 19-21, 1996, in Denver, Colorado, to share the lessons learned in SMS implementation at the ten priority facilities and to address future implementation paths. This workshop will be a forum for developing plans for the next phase of our SMS initiative. Your current and intended representatives to the Safety Management Implementation Team should participate in the workshop, if possible. A list of the current team members is provided in Attachment 2. I also request that you provide to Frank McCoy by November 8, 1996, the names of designated SMS representatives for your field offices and facilities so that we may move ahead in a timely manner. The team will continue its coordination with your staff and designated representatives to ensure that the benefit of our experience and the lessons learned are provided for tailoring the SMS at your facilities. Your continuing support is needed if we are to succeed.

I solicit your cooperation and assistance and look forward to supporting your efforts in this regard as the Secretary's policy is implemented. If you have any questions or if you wish to discuss this subject further, please contact Frank McCoy at (202) 586-1418 or (803) 725-8600.

- Attachments: 1. Safety Management System Policy Notice, DOE P 450.4  
2. Current Safety Management Implementation Team Members

cc:

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T. O'Toole, EH-1  
A. Alm, EM-1  
D. Pearman, FM-1  
F. McCoy, Director, 95-2 Safety Management Implementation Team  
Manager, Albuquerque Operations Office  
Manager, Amarillo Area Office  
Manager, Argonne Area Office  
Manager, Chicago Operations Office  
Manager, Idaho Operations Office  
Manager, Kansas City Area Office  
Manager, Los Alamos Area Office

cc: (continued)

Manager, Nevada Operations Office  
Manager, Oak Ridge Operations Office  
Manager, Oakland Operations Office  
Manager, Ohio Operations Office  
Manager, Richland Operations Office  
Manager, Rocky Flats Operations Office  
Manager, Savannah River Operations Office  
Director, Morgantown Energy Technology Center  
Director, Pittsburgh Energy Technology Center  
Manager, Western Environmental Technology Office  
Director, Ames Laboratory  
Director, Argonne National Laboratory (East)  
Director, Argonne National Laboratory (West)  
Manager, Atlanta Support Office  
Manager, Bartlesville Project Office  
Manager, Batavia Area Office  
Director, Bettis Atomic Power Laboratory  
Manager, Boston Support Office  
Manager, Brookhaven Area Office  
Director, Brookhaven National Laboratory  
Manager, Chicago Regional Support Office  
Director, Thomas Jefferson National Accelerator Facility (former CEBAF),  
Newport News, VA  
Manager, Dallas Support Office  
Manager, Denver Support Office  
Director, Energy-Related Health Research Laboratory  
Director, Energy Technology Engineering Center  
Director, Energy Measurements Laboratory  
Director, Fermi National Accelerator Laboratory  
Manager, Fernald Field Office  
Manager, Golden Field Office  
Manager, Grand Junction Projects Office  
Director, Hanford Environmental Health Foundation  
Director, Idaho National Engineering Laboratory  
Director, Inhalation Toxicology Research Institute  
Manager, Kansas City Support Office  
Manager, Kirtland Area Office  
Director, Knolls Atomic Power Laboratory  
Director, Lawrence Berkeley Laboratory  
Director, Lawrence Livermore National Laboratory  
Director, Lawrence Livermore National Laboratory -- Nevada Test Site  
Manager, Lockheed Idaho Technical Center  
Director, Los Alamos National Laboratory  
Manager, Naval Petroleum Reserves - California  
Manager, Naval Petroleum and Oil Shale Reserves - Colorado, Utah and Wyoming

cc: (continued)

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Manager, Philadelphia Support Office

Manager, Pinellas Area Office

Manager, Pittsburgh Naval Reactors Office

Manager, Portsmouth Enrichment Office

Manager, Princeton Area Office, Princeton, NJ

Director, Princeton Plasma Physics Laboratory

Director, Radiobiology & Environmental Health Laboratory, University of  
California, San Francisco, CA

Manager, San Francisco Support Office

Director, Sandia National Laboratories--Albuquerque, NM

Director, Sandia National Laboratories

Director, Savannah River Ecology Laboratory

Manager, Schenectady Naval Reactors Office

Manager, Seattle Support Office

Director, Stanford Linear Accelerator Center

Manager, Stanford Support Office

Director, Stanford Synchrotron Radiology Laboratory

Manager, Strategic Petroleum Reserve Project Office, New Orleans, LA

Director, Laboratory of Structural Biology and Molecular Medicine,  
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Director, U.S. Mission - OECD, U.S. Embassy, Paris, France

Manager, Waste Isolation Pilot Project Office, Carlsbad, NM

Manager, Westinghouse Electric Corp., Bettis Atomic Power Laboratory Naval  
Reactors Facility, Scoville, IN



**Department of Energy**  
Washington, DC 20585

ATTACHMENT 1

September 26, 1996

## MEMORANDUM FOR THE SECRETARY

FROM: *[Signature]* Tara O'Toole, M.D., M.P.H.  
Assistant Secretary  
Environment, Safety and Health

SUBJECT: ACTION: Approval of Policy Statement, DOE P 450.4. Safety Management System Policy

ISSUE: The purpose of this memorandum is to request your approval of the policy statement requiring the Department to implement a formal, organized safety management process whereby people plan, perform, assess, and improve the safe conduct of work.

DISCUSSION: The attached policy statement establishes a Safety Management System institutionalized through Department of Energy directives and contracts. It would establish the Department-wide safety management objective, guiding principles, and functions. The system encompasses all levels of activities and documentation related to safety management throughout the DOE complex. The policy applies Department-wide, with the exception of the Naval Nuclear Propulsion Program, where the objectives of this policy are achieved by other means.

The policy statement was given full departmental coordination through the Directives System Points of Contact, and has been reviewed by the Defense Nuclear Facilities Safety Board. Subsequent to the review and comment resolution process, only editorial changes were necessary.

SENSITIVITIES: The development of the policy statement meets commitment 1.1 of the April 8, 1996, Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 95-2.

POLICY IMPACT: The issuance of this policy statement will satisfy the first milestone in the critical process of establishing an integrated systems approach to managing safety throughout the Department.

RECOMMENDATION: That you approve the attached policy statement.

Attachment

Approve

Disapprove

Date: October 15, 1996

*[Signature: Hazel R. O'Leary]*



10-15-96

**SUBJECT: SAFETY MANAGEMENT SYSTEM POLICY**

**PURPOSE AND SCOPE**

Safety Management Systems provide a formal, organized process whereby people plan, perform, assess, and improve the safe conduct of work. The Safety Management System is institutionalized through Department of Energy (DOE) directives and contracts to establish the Department-wide safety management objective, guiding principles, and functions.

The system encompasses all levels of activities and documentation related to safety management throughout the DOE complex. The objective of this policy is achieved by other means for Naval Reactors (Naval Nuclear Propulsion Program).

Throughout this policy statement, the term safety is used synonymously with environment, safety and health (ES&H) to encompass protection of the public, the workers, and the environment.

**POLICY**

The Department is committed to conducting work efficiently and in a manner that ensures protection of workers, the public and the environment. It is Department policy that safety management systems described herein shall be used to systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the public, the worker, and the environment. Direct involvement of workers during the development and implementation of safety management systems is essential for their success.

The DOE safety management system establishes a hierarchy of components (see figure 1) to facilitate the orderly development and implementation of safety management throughout the DOE complex. The safety management system consists of six components: 1) the objective, 2) guiding principles, 3) core functions, 4) mechanisms, 5) responsibilities, and 6) implementation. The objective, guiding principles, and core functions of safety management identified below shall be used consistently in implementing safety management throughout the DOE complex. The mechanisms, responsibilities, and implementation components are established for all work and will vary based on the nature and hazard of the work being performed.

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**DISTRIBUTION:**

All Departmental Elements

**INITIATED BY:**

The Office of Environment,  
Safety and Health

## COMPONENT 1 *Objective of Integrated Safety Management*

*The Department and Contractors must systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the public, the worker, and the environment. This is to be accomplished through effective integration of safety management into all facets of work planning and execution. In other words, the overall management of safety functions and activities becomes an integral part of mission accomplishment.*

## COMPONENT 2 *Guiding Principles for Integrated Safety Management*

*The guiding principles are the fundamental policies that guide Department and contractor actions, from development of safety directives to performance of work.*

*Line Management Responsibility for Safety.* *Line management is directly responsible for the protection of the public, the workers, and the environment. As a complement to line management, the Department's Office of Environment, Safety and Health provides safety policy, enforcement, and independent oversight functions.*

*Clear Roles and Responsibilities.* *Clear and unambiguous lines of authority and responsibility for ensuring safety shall be established and maintained at all organizational levels within the Department and its contractors.*

*Competence Commensurate with Responsibilities.* *Personnel shall possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities.*

*Balanced Priorities.* *Resources shall be effectively allocated to address safety, programmatic, and operational considerations. Protecting the public, the workers, and the environment shall be a priority whenever activities are planned and performed.*

*Identification of Safety Standards and Requirements.* *Before work is performed, the associated hazards shall be evaluated and an agreed-upon set of safety standards and requirements shall be established which, if properly implemented, will provide adequate assurance that the public, the workers, and the environment are protected from adverse consequences.*

*Hazard Controls Tailored to Work Being Performed.* *Administrative and engineering controls to prevent and mitigate hazards shall be tailored to the work being performed and associated hazards.*

*Operations Authorization.* *The conditions and requirements to be satisfied for operations to be initiated and conducted shall be clearly established and agreed-upon.*

## COMPONENT 3 - *Core Functions for Integrated Safety Management*

*These five core safety management functions provide the necessary structure for any work activity that could potentially affect the public, the workers, and the environment. The functions are applied as a continuous cycle with the degree of rigor appropriate to address the type of work activity and the hazards involved.*

*Define the Scope of Work.* *Missions are translated into work, expectations are set, tasks are identified and prioritized, and resources are allocated.*

*Analyze the Hazards. Hazards associated with the work are identified, analyzed and categorized.*

*Develop and Implement Hazard Controls. Applicable standards and requirements are identified and agreed-upon, controls to prevent/mitigate hazards are identified, the safety envelope is established, and controls are implemented.*

*Perform Work within Controls. Readiness is confirmed and work is performed safely.*

*Provide Feedback and Continuous Improvement. Feedback information on the adequacy of controls is gathered, opportunities for improving the definition and planning of work are identified and implemented, line and independent oversight is conducted, and, if necessary, regulatory enforcement actions occur.*

#### **COMPONENT 4 *Integrated Safety Management - Mechanisms***

*Safety Mechanisms define how the core safety management functions are performed. The mechanisms may vary from facility to facility and from activity to activity based on the hazards and the work being performed and may include:*

*Departmental expectations expressed through directives (policy, rules, orders, notices, standards, and guidance) and contract clauses.*

*Directives on identifying and analyzing hazards and performing safety analyses.*

*Directives which establish processes to be used in setting safety standards.*

*Contractor policies, procedures and documents (e.g., Health and Safety Plans, Safety Analysis Reports, Chemical Hygiene Plans, Process Hazard Analyses) established to implement safety management and fulfill commitments made to the Department.*

#### **COMPONENT 5 *Responsibilities for Integrated Safety Management***

*Responsibilities must be clearly defined in documents appropriate to the activity. DOE responsibilities are defined in Department directives. Contractor responsibilities are detailed in contracts, regulations and contractor-specific procedures. For each management mechanism employed to satisfy a safety management principle or function, the associated approval authority needs to be established. The review and approval levels may vary commensurate with the type of work and the hazards involved.*

#### **COMPONENT 6 *Implementation of Integrated Safety Management***

*Implementation involves specific instances of work definition and planning, hazards identifications and analysis, definition and implementation of hazard controls, performance of work, developing and implementing operating procedures, and monitoring and assessing performance for improvement.*



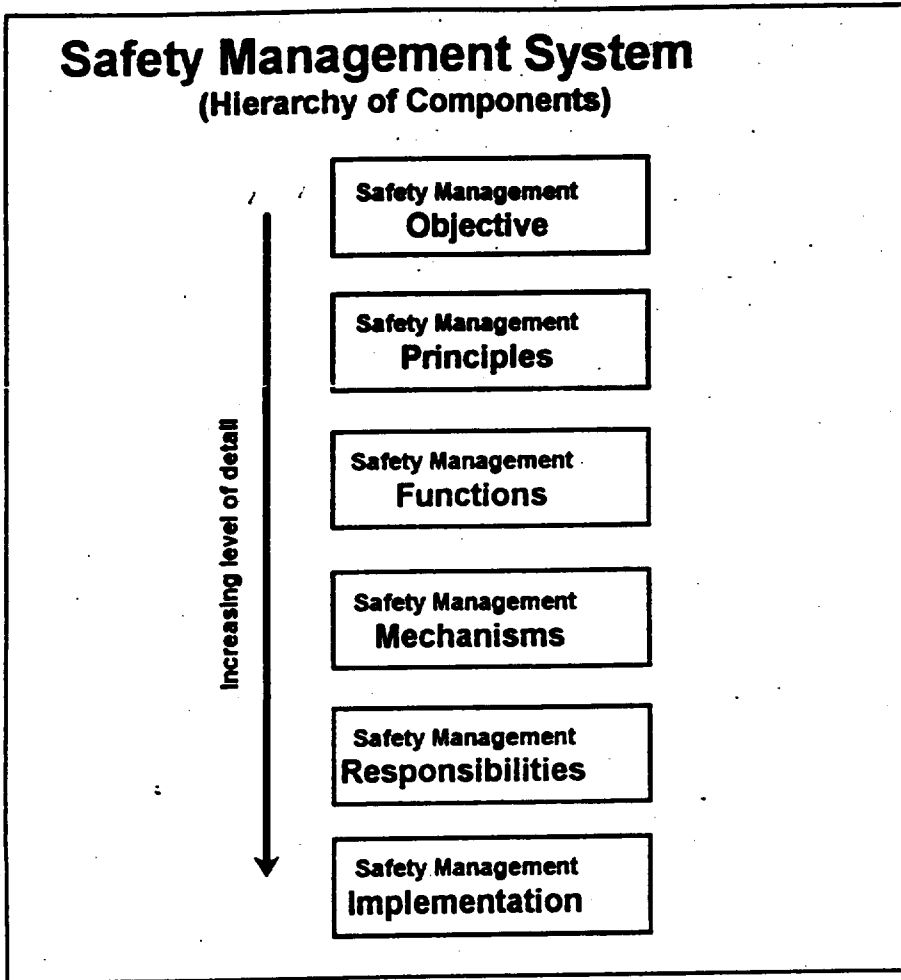


Figure 1



HAZEL R. O'LEARY  
Secretary of Energy

# SAFETY MANAGEMENT IMPLEMENTATION TEAM

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## SAFETY MANAGEMENT IMPLEMENTATION TEAM

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