



Integrated Safety Management: New Requirements in DOE Order 450.1A

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Overview



- EMS requirements of DOE Manual 450.4
- ISM references in DOE Order 450.1A
- What is required for contractors
- What is required for DOE program and field offices
- Integrating EMS into ISM
- Planned guidance



Integration with ISM Systems



Insofar as possible EMS requirements are linked to existing requirements in DOE M 450.4 ISMS Manual.

Existing req'ts in DOE M 450.4

- DOE field offices and DOE program offices are to implement ISM Systems
- DOE offices are to set annual performance expectations and performance objectives
- DOE offices are to conduct annual ISMS effectiveness reviews

Related req'ts in DOE O 450.1A

- DOE field offices and program offices are to incorporate specified elements in their ISM Systems
- DOE offices are to identify significant aspects; establish goals and measurable targets [§ 4.e.]
- DOE offices are to address implementation of DOE O 450.1A requirements in the annual reviews [§5.c.(2); §5.d.(2)]



Requirements of DOE M 450.4 ISMS Manual



- "In ISM, the term "safety" is used synonymously with environment, safety, and health (ES&H) to encompass protection of the public, the workers, and the environment" [§I-1 ¶1, p I-1]
- "Throughout this Manual, ISM is defined to include applicable integration with EMS ..." [§I-1 ¶2, p I-1]



Secretarial Office ISM System Descriptions



- "ISM system descriptions for DOE Secretarial offices ... must describe ...how EMS, QAP, and other management processes and systems are integrated into the ISM system" [§II.1.a.(1)(d)]
- "Secretarial office ISM system descriptions ...
 should follow applicable DOE direction and
 guidance, including that found in ... DOE G
 450.1-2, Implementation Guide for Integrating
 EMSs into ISM Systems" [§II.1.a.(2)(c)]



Field Office ISM System Descriptions



- "ISM system descriptions for DOE field offices ...will describe ... how EMS, QAP, and other management systems and processes are integrated into the ISM system" [§II.1.b.(1)(d)]
- "Field office ISM system descriptions ... should follow applicable DOE direction and guidance, including that found in ... DOE G 450.1-2, Implementation Guide for Integrating EMSs into ISM Systems" [§II.1.b.(2)(c)]



DOE O 450.1A Requirements For Contractors



The Department ... requires integration of ... Environmental Management System (EMS) into ISM systems, as delineated in ... DOE O 450.1, Environmental Protection Program [CRD § 1]



DOE O 450.1A Requirements for DOE Offices



- DOE O 450.1A does not require DOE field and program offices to implement a discrete EMS
- DOE O 450.1A does require DOE field and program offices to incorporate certain elements into their ISM system



Requirements in DOE O 450.1A



- Each DOE site must develop and implement an EMS [which] must be integrated into the site's ISM system [§ 4.a.]
- As part of integrating EMSs into ISM systems ... Program Secretarial Officers, Administrators, and Field Office Managers shall incorporate appropriate performance objectives, measures and commitments to support the following at site(s) under their purview.
 - 1. compliance with applicable environmental protection requirements,
 - achievement of the DOE Sustainable Environmental Stewardship goals found in Attachment 2 of this Order and the energy and transportation goals in DOE O 430.2B, and
 - 3. implementation and oversight of the environmental management system.



Requirements in DOE O 450.1A (cont.)



Field Office Managers must:

- "Address, as part of their annual ISM effectiveness reviews, ... the implementation of ... [the EMS requirements] ... of this Order by sites under their purview" [§ 5.d.(2)]
- "Assess as part of the review and approval of contractors'
 ISM system descriptions and updates ... the implementation of the [EMS] requirements ... of this Order" [§ 5.d.(3)]
- "Ensure all personnel whose actions are affected by this Order receive, as part of their ISM training, EMS awareness training ..." [§ 5.d.(15)]
- "At sites with multiple EMSs, ensure that site-wide environmental aspects are integrated into each EMS or within the Field Office ISM system" [§ 5.d.(4)]



Integrating EMS into ISM System



- Integrate into ISM appropriate environmental performance objectives, measures and commitments for
 - Regulatory compliance
 - DOE sustainable environmental stewardship goals and energy and transportation goals
 - Implementation and oversight of EMS [§4.e.]
- Integrate oversight of contractor ISM/EMS
- Integrate annual management review of DOE ISM/EMS
- Integrate EMS audit into ISM validations



Planned Guidance



- Guide 450.1A-α -- EMS Development, Validation, and Integration into ISMS
 - Audience: EMS managers
 - Will update and replace current
 DOE G 450.1-1 and DOE G 450.1-2
 - Will discuss integration into ISM
- Guide 450.1A-β -- Integrating Sustainable Practices into the EMS
 - Audience: staff in various functional activities
 - Will replace various existing guides
- Guide 450.1A-γ -- Compliance Management Program





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