

Reclamation Manual

Policy

Subject: Decisions Related to Dam Safety Issues

Purpose: To establish the authority to make decisions related to dam safety issues in Reclamation, to present the procedure for delegation of authority for decisionmaking, to present requirements for documentation, and to ensure a decision is made on each issue in a timely manner.

Authority: Reclamation Project Act of 1902 and Supplementary Acts; Reclamation Safety of Dams Act of 1978, as amended; and Departmental Manual Part 753, Dam Safety Program.

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1. Introduction.

- A. Bureau of Reclamation dams and appurtenant works are high energy structures which present risks to Reclamation and District employees and to the public. The management of dam safety issues is critical to Reclamation's ability to manage the risk environment which these structures present. Decisions on the response of Reclamation to dam safety issues need the input of the Regional Director; the Area Manager; and the Chief, Dam Safety Office to ensure that the risk environment is being appropriately managed. Because the resolution of dam safety issues has an impact on personnel and public safety, the individuals responsible for the decisionmaking need to be appropriately authorized and the decisions need to be appropriately documented and communicated. The processes described in this document require collaboration, establish accountability, and enhance communication among Reclamation groups during decisionmaking.
- B. Dam safety issues may be identified as Reclamation operates, maintains, monitors, inspects, or analyzes a structure. The response by Reclamation to such issues may be to monitor, inspect, analyze, or otherwise address the issue while continuing to operate the structure. Some issues may present such risk that the action of Reclamation will be to restrict normal operations and/or move aggressively to modify the structure to reduce risk.
- C. Issues may be resolved through various programs and authorities. Delegation of decisionmaking is appropriate to ensure that issues are addressed quickly, but processes will ensure that the Regional Director; Area Manager; and Chief, Dam Safety Office will receive copies of decision documentation. While all issues will be addressed, issues presenting the most risk and requiring operational or structural modification must receive the highest management attention.

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- D. Assuring the safety of the public is a key federal responsibility. While the decisions concerning such matters are reserved for Reclamation, decisions to reduce risks that will affect water and/or power contractors will be communicated with those contractors and power marketing agencies within 30 days of such a decision.

2. Scope.

- A. This policy applies to all high- or significant-hazard dams that are either owned by Reclamation or included as part of an authorized Reclamation project. This policy establishes requirements for decisionmaking related to dam safety issues. Dam safety issues are issues which, if not resolved:
- (1) Could lead to a failure or malfunction resulting in an uncontrolled release of stored water that would place downstream populations and/or resources at risk or
 - (2) Would compromise the agency's ability to detect developing adverse dam performance and prudently respond to that performance.

Dam safety issues included in the scope of this policy are issues related to a specific dam. A decision is required for each issue. Procedures for identifying, communicating, and documenting decisions are described in paragraph 4 below.

- B. Processes used in day-to-day activities that provide technical input (e.g., risk analysis) and task and resource management (e.g., service agreements) in support of dam safety work are described in guidance provided by the Dam Safety Office and the Technical Service Center. Day-to-day operations and management of emergencies at facilities are prescribed in official documents including Standing Operating Procedures and Emergency Action Plans. Authorizations of dam safety related structural modifications under the Reclamation Safety of Dams Act, as amended, are retained by the Commissioner.

3. Responsibilities.

- A. Authority to make decisions to resolve dam safety issues is delegated by the Commissioner to the Regional Directors. Each Regional Director will be responsible for decisions related to issues at specific dams within their Region. All decisions will be made in collaboration with the Chief, Dam Safety Office and the Area Manager for the specific dam.

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- B. The Regional Directors and the Chief, Dam Safety Office are responsible for keeping the Commissioner adequately informed of dam safety issues and decisions.
- C. All Reclamation employees are responsible for communication of dam safety issues that they have identified or that have been called to their attention. This communication may be through the official channels of the employee's particular organization to the Chief, Dam Safety Office, or the Regional Director, or Area Manager for the specific dam. Employees may also communicate directly to the Chief, Dam Safety Office, or the Regional Director, or Area Manager.
- D. The Regional Director and Area Manager are responsible for assuring that necessary actions to reduce risk are communicated to water/power contractors and power marketing agencies and that they have an opportunity to participate in the development of the risk reduction alternatives.
- E. Reclamation contractors who have elected to participate in the process of determining a risk reduction action are responsible for meeting the security requirements according to Reclamation policy. Regional Directors and Area Managers are responsible for assuring that these requirements are communicated and met.

4. Procedures.

- A. **Identifying and Communicating Issues Requiring Decisions.** Dam safety issues can be identified in a number of ways. For instance an issue could be identified as the result of an established periodic process such as those described in the review and examination program for high- or significant-hazard dams, through the review and analysis of monitoring data, or through observations at the site. In most cases communication of an issue will be written. A documented decision on Reclamation's action will be made in a timely manner for every dam safety issue identified.

When a decision has been made to take action to reduce risk, additional issues identified during the implementation of that action will also be subject to this policy.

- B. **Delegation.**

- (1) Decision authority for resolution of dam safety issues is delegated by the Commissioner to the Regional Directors. Further delegation of decisionmaking authority by the Regional Directors to individuals or positions in their organizations may occur. Also the Chief, Dam Safety Office and the Area Managers may delegate their role as collaborative decisionmakers to individuals or positions in their organizations. Documents of delegation must include a complete list of individuals or positions to whom authority is delegated and all terms and limitations of delegation.

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- (2) All decisions related to this policy will be made through collaboration among the Regional Director; the Chief, Dam Safety Office; and the Area Manager for the specific dam either directly or through their delegates. Decisions regarding the determination of need to reduce risk are an inherent federal responsibility.

C. Documentation.

- (1) **Documentation of Decisions.** Written documentation of a decision is required for each issue. If after an issue is identified and a decision is made that no action by Reclamation is justified, then that decision will be documented. If there is agreement that action by Reclamation is justified, then the documentation will describe the decision as to how and when the issue will be addressed. Documentation of a dam safety related decision may be initiated by any participant of the collaborative decisionmaking process. It is the responsibility of the initiator to provide a copy of the record to the other two parties. The documentation must state concurrence of the Regional Director; Area Manager; and Chief, Dam Safety Office, either directly or through their delegates, and must include the names of those who concurred. Hard copies of all decisions will include the signature of the initiator and must be provided to the Regional Director; the Chief, Dam Safety Office; and the Area Manager of the specific dam.
- (2) **Documentation of Delegation.** All delegations will be in writing. The delegator of authority will prepare the complete record of delegation. A copy of each record of delegation must be provided to the Dam Safety Officer; the Chief, Dam Safety Office; and the appropriate Regional Director and Area Managers.

D. Notification of Water/Power Contractors.

- (1) **Notification of Decision of Risk Reduction Action.** Decisions requiring action to reduce risk will be communicated to water/power contractors and power marketing agencies in timely fashion. Such communication shall be in writing and will identify the basis of the need to take action and will invite them to participate in the process of determining the most reasonable action to take. Whenever possible, contractors will be briefed on such decisions prior to the completion and transmittal of the decision document. When it is not possible to brief contractors prior to a decision, the decision will be communicated to them within 30 days thereafter.
- (2) **Plans for Periodic Communication and Reporting.** Reclamation will work with water/power contractors and power marketing agencies to develop a plan for periodic communication and reporting of project status during the period of the

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dam safety modification. This plan will be documented in writing and transmitted to water/power contractors and power marketing agencies. The plan will include provisions for communicating documented decisions made during the process of implementing the risk reduction action(s).