

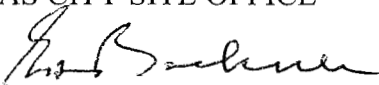


Department of Energy
National Nuclear Security Administration
Washington, DC 20585

June 4, 2004

MEMORANDUM FOR MANAGER, KANSAS CITY SITE OFFICE

FROM:

Everet H. Beckner 
Deputy Administrator
for Defense Programs

SUBJECT:

ACTION: APPROVAL OF THE KANSAS CITY SITE
OFFICE (KCSO) FUNCTIONS, RESPONSIBILITIES AND
AUTHORITIES MANUAL (FRAM)

In accordance with my responsibilities and authorities covered in Section 3.4 of the National Nuclear Security Administration (NNSA) FRAM, I approve the attached KCSO FRAM, dated March 24, 2004. Our review has determined that the KCSO FRAM covers all needed functions, responsibilities and authorities required by NNSA FRAM.

Please note that we plan to update the NNSA FRAM by October 15, 2004, to be consistent with Department of Energy (DOE) FRAM, DOE M411.1C. This will require an update of the Site Office FRAM within 90 days of the issuance of the updated NNSA FRAM.

We are requesting you to ensure that the Site Office FRAM, including all needed processes and procedures, is fully implemented in a timely manner. We plan to verify FRAM implementation, as required by NNSA FRAM, in the near future in conjunction with other planned reviews.

If you have questions, please contact Rabi Singh at (301) 903-5864.

Attachment

cc w/o attachment:
L. Brooks, NA-1
T. Przybylek, NA-2



United States Government

Department of Energy

memorandum

National Nuclear Security Administration
Kansas City Site Office
Kansas City, Missouri 64141-0202

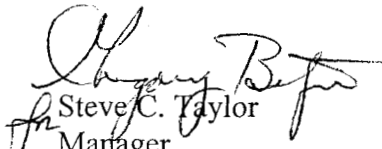
DATE: MAR 25 2004

REPLY TO: KCSO:OSS (1060A2)

SUBJECT: **Kansas City Site Office (KCSO) Functions, Responsibilities, and Authorities Manual (FRAM) - Revision**

TO: Everet H. Beckner, Deputy Administrator for Defense Programs, NA-10, FORS, HQ

As requested in your November 4, 2003 memorandum, the KCSO developed a Quality Assurance Plan (QAP) for Safety Management Functions, Responsibilities, and Authorities in accordance with the National Nuclear Security Administration (NNSA) FRAM and DOE P 411.1, and submitted the initial QAP/FRAM for your approval February 3, 2004. Based on input from Rabindra Singh of your staff, the KCSO has revised the KCSO QAP/FRAM to include an Appendix that crosswalks NNSA FRAM requirements. The attached revised KCSO QAP/FRAM is submitted for your approval.



Steve C. Taylor
Manager

Attachment

3/24/2004

i

Kansas City

Site

Office

**QUALITY ASSURANCE PLAN
FOR
SAFETY MANAGEMENT
FUNCTIONS, RESPONSIBILITIES,
AND AUTHORITIES, LEVEL II**

March 2004

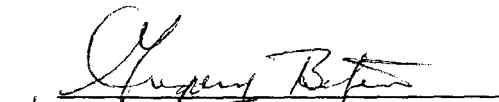


DISTRIBUTION: KCSO

**Kansas City Site Office
Quality Assurance Plan
For
Safety Management Functions,
Responsibilities, and Authorities, Level II**

The Kansas City Site Office (KCSO) Quality Assurance Plan documents how the Quality Plan for KCSO assigns the functions, responsibilities, and authorities for Safety Management for the federal responsibilities in regards to the primary mission of the Kansas City Plant (KCP). The KCSO Manager is responsible and accountable for ensuring the safety and security of operations at the KCP. Under an NNSA contract, the site contractor is charged with operating KCP in a safe and secure manner. The KCSO Manager and staff execute the National Nuclear Security Administration (NNSA) direction and guidance through this KCP Managing and Operating Contract. Specific responsibilities and authorities are detailed among each Assistant and Deputy Manager to enable effective execution of NNSA mission objectives.

KCSO manages through a quality assurance plan and associated procedures that constitute the business management system governing all federal site activities. This quality assurance plan ensures that safety management functions for KCSO are defined within the KCSO Quality Manual and that responsibilities and authorities for safety management are documented. This Quality Assurance Plan meets the requirements of a Level II Functions, Responsibilities, and Authorities Manual (FRAM) for KCSO. This plan is approved by the KCSO Manager with input and feedback from the KCSO staff.


for Steve C. Taylor, Manager
Kansas City Site Office

REVISION LOG

Revision Number	Affected Page(s)	Date	Reason for Revision
Revision #1	Appendix C	3-19-04	Added Crosswalk To NNSA FRAM

- 1. INTRODUCTION 5
- 2. PURPOSE 6
- 3. OBJECTIVES 7
- 4. SCOPE 7
- 5. RESPONSIBILITIES 7
 - a. KCSO Manager 7
 - b. Deputy Manager, Direct Reports, and Assistant Managers 8
 - c. Other KCSO Personnel 8
 - d. NNSA and Honeywell FM&T Integrated Safety Management System Relationship 5
 - e. KCSO Organization Description 9
- 6. DELEGATION OF AUTHORITY 12
- 7. OVERVIEW OF LINE MANAGEMENT INTERFACES 12
- 8. OTHER AGENCY INTERFACES 13
- 9. REQUIREMENTS 14
 - a. KCSO QAP/FRA 14
 - b. KCSO QAP/FRA Changes/Records 14
 - c. Directives/Standards Change Control 14
 - d. Guiding Principles for Integrated Safety Management (ISM) 15
- 10. CORE FUNCTIONS, RESPONSIBILITIES, AND AUTHORITIES
 - Appendix A - KCSO Flow of Responsibilities and Authorities A-1
 - Appendix B - KCSO Roles and Responsibilities for Safety Management B-1
 - Appendix C - NNSA FRAM Crosswalk C-1

1. INTRODUCTION

The Kansas City Site Office's (KCSO) mission as part of the NNSA national mission is to:

- Accomplish the National Security Mission.
- Comply with laws and regulations.
- Minimize risk to our associates, the public, and the environment.
- Protect National Nuclear Security Administration facilities and resources.
- Foster quality and continuous improvement
- Be customer oriented.

To accomplish this mission, the following nonexclusive list is an overview of some of KCSO's current activities:

- Maintenance of technical capability for nuclear weapons development and production;
- Construction and maintenance of all facilities in support of assigned programs;
- Effectively manufacture, and assess all electrical, mechanical, and plastic non-nuclear components in the nuclear stockpile while protecting people and the environment. Such efforts extend from program inception through weapon retirement.
- Build and renovate facilities that will enable KCP to improve its support of the nation's nuclear weapons stockpile and reduce operational costs and to improve program efficiency and environment, health, safety, and security.
- Other programs as assigned.

The KCSO Manager is ultimately responsible and accountable for ensuring the safety of operations for the Kansas City Plant. KCSO is committed to conducting work safely, securely, and efficiently and to the Secretary of Energy's goal of an Integrated Safety Management System (ISMS). The ISMS is defined in DOE Policies 450.4, *Safety Management System Policy*, DOE O 411.1, *Safety Management Functions, Responsibilities, and Authorities Policy*, DOE O 450.5, *Line Environment, Safety and Health Oversight*, and NNSA FRAM, *Safety Management Functions, Responsibilities and Authorities Manual*. The KCSO has developed and maintains a Quality Manual that provides a high level description of processes and responsibilities of the Site Office based on the ISO 9001 format of quality management. This includes quality principles including continuous improvement, self assessment, and process documentation and control.

Department and contractor employees performing work for KCSO must comply with applicable federal, state, and local laws and regulations. KCSO flows down standards and requirements as direction to NNSA employees when these standards/requirements are necessary to ensure that the work will meet the NNSA's expectations and objectives. Specific responsibilities and authorities are listed within the KCSO Quality Manual. Appendix B is the current subset of roles and responsibilities for Safety Management. The Quality Manual, together with the guiding principles and core management functions established in DOE Policy 450.4, facilitates the integration of sound environment, safety, and health (ES&H) and selected administrative practices into day-to-day operations.

KCSO line management and oversight responsibilities are assigned by the KCSO Manager through the Assistant and Deputy Manager to the staff, with assistance as requested from the NNSA Service Center.

A description of KCSO's line management responsibilities and activities used to support those responsibilities is provided in the KCSO Quality Manual.

2. PURPOSE

The KCSO Quality Assurance Plan for Safety Management (QAP/FRA) documents the federal description of responsibilities in regards to the primary mission at the KCP. The KCSO Manager is responsible and accountable for ensuring the safety of operations at KCP. The KCSO Manager provides direction and guidance to the KCSO Contracting Officer who executes the requirements to the KCP contractor and subcontractor(s). Deputy and Assistant Manager are designated Contracting Officer Representatives (COR) for execution of directed work under the contract. Specific responsibilities and authorities are further detailed among KCSO staff to enable effective oversight of NNSA program direction. These delegations and designations of functions, responsibilities and authorities are controlled and maintained through the KCSO Quality Manual. The alignment of KCSO's organization ensures clear understanding of roles, efficient integration of knowledge and resources, and accountability for line management's responsibility for safety.

The NNSA FRAM *Safety Management Functions, Responsibilities, and Authorities Manual* (FRAM) succinctly defines NNSA expectations regarding organizational accountability for safety management. This NNSA FRAM requires:

- All NNSA operations must systematically integrate safety into management and work practices such that missions are accomplished while protecting the public, workers, and the environment. This Manual and complementary Site FRAMs are established to comply with the Secretary's direction concerning safety management responsibilities and authorities stated in DOE P 411.1 and DOE M 411.1-1B, *Safety Management Functions, Responsibilities and Authorities Manual* (DOE FRAM).
- NNSA managers assigned safety management functions, responsibilities and/or authorities in the NNSA FRAM shall develop "how" documents (i.e., implementing processes that define safety management functions to execute responsibilities and delegated authorities), as needed, for implementation of their specific safety management functions. The NNSA FRAM shall be maintained and updated as a living document to reflect organizational and/or functional changes that affect the NNSA FRAM.

KCSO personnel are committed to a set of common strategic goals and values that are traceable to, and in accordance with, the NNSA's commitment to the principles and functions of an Integrated Safety Management System (ISMS). KCSO goals and values are established at a corporate level and documented in the annual KCSO Operations Plan to accomplish NNSA/DOE's overall strategic goals, plans and objectives. The KCSO personnel develop an annual Performance Evaluation Plan that defines contractor performance expectations and measures to achieve mission goals and objectives. The plan contains specific actions and measures of success that are monitored and reported. Through this plan, KCSO has a formal system for recognizing and rewarding successful performance to meet the DOE's overall ISMS strategic goals, plans and objectives. KCSO management holds federal personnel accountable for achieving mission goals and objectives. A flow down of the performance requirements is captured in each individual's annual performance goals as reflected in the KCSO Operational Plan.

The purpose of this QAP is to ensure that all the requirements of the NNSA FRAM are defined within the KCSO Quality Manual as procedures. The KCSO QAP/FRA captures how ISMS is implemented per DOE Policies 411.1 and 450.4 for federal employees. The QAP/FRA addresses the seven guiding principles and five core safety management functions described in DOE Policy 450.4.

3. OBJECTIVES

- Document functions, responsibilities, and authorities for KCSO staff to comply with and adhere to ISMS functions while executing their work activities.
- Document safety delegations of authority from Headquarters (NNSA-HQ) organizations to KCSO management, where those delegations have been made separate from DOE Order responsibility statements.

4. SCOPE

This manual describes KCSO safety management functions, responsibilities and authorities and implementing mechanisms for performing the DOE's seven guiding principles and five core safety management functions. This QAP/FRA applies to all KCSO personnel who provide technical direction and oversight of the contractor's performance and execution of work at the KCP. This manual addresses safety management or planning, funding, performing, assessing, improving, and enforcing the requirements necessary to work safely, including the establishment of standards for which the KCSO Manager is responsible.

5. RESPONSIBILITIES

The KCSO Quality Manual documents the requirements, functions, responsibilities, and assignment for all KCSO activities. The information contained within the FRAM and Appendix 'B' represents a current subset of how the KCSO function, responsibilities, and authorities are managed and carried out by position for Safety Management.

a. KCSO Manager

(1) Directs the Deputy and Assistant Managers to comply with this document and support the maintenance of the KCSO Quality Manual and KCSO QAP/FRA.

(2) Approves the KCSO Quality Manual and CAP/FRA and changes.

b. Deputy Manager, and Assistant Managers, and KCSO staff

(1) Execute assigned management functions, responsibilities and authorities as defined by the KCSO Quality Manual and KCSO QAP/FRA and other documents (Program Plans, Position Descriptions, Process Descriptions, Work Instructions, etc.).

(2) Submit recommended changes to the KCSO Quality Manual and KCSO QAP/FRA to the KCSO Manager or designee.

c. NNSA and Honeywell FM&T Integrated Safety Management System Relationship

At the KCP, the core safety management functions address the primary missions and general operations. The primary missions include production, disassembly and evaluation of non-nuclear components for nuclear weapons. A secondary mission includes support to work of other DOE and NNSA organizations including laboratories, the Office of Secure Transportation (OST), and other federal agencies.

Consistent with the prime contract, tasks are developed annually that are administered through Work Authorizations (WAs). The WAs define the scope of work to be performed for each task. The WAs reflect workload requirements that are derived from the issuance of other documents such as the Program Control Document and Planning and Program Direction Document that define the workload for nuclear weapons components.

Site hazards at KCP are typical of those found in general industry, therefore industrial standards (regulatory and consensus) form the core safety requirements at KCP. Additional facility and activity specific safety standards and requirements are identified through the hazard analysis process (e.g., job safety hazard analysis). Controls are then derived based on the facility and activity specific safety standards and requirements and the site-level standards and requirements (see Figure 1). Once controls are established and confirmed and operations authorized, work begins. The work is then periodically evaluated and feedback is provided to further continuous improvement in the safety of operations at KCP.

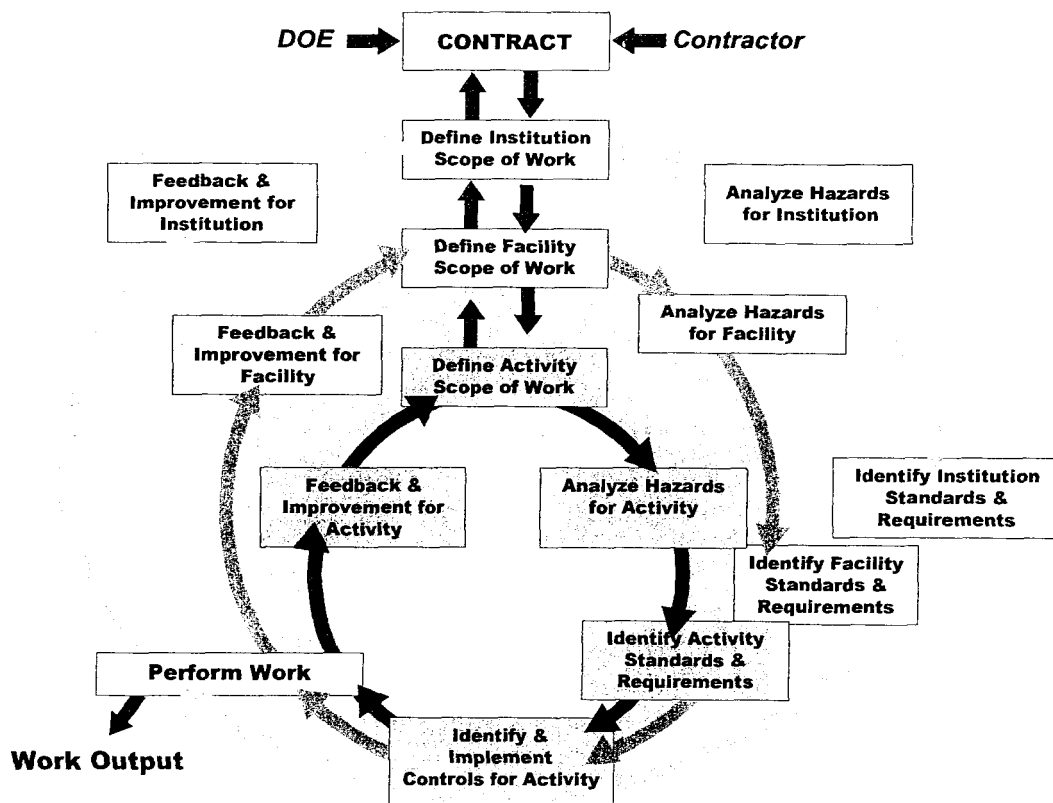


Figure 1
NNSA/Contractor ISM Relationship

e. KCSO Organization Description

KCSO Manager

The KCSO Manager provides primary leadership and direction to the operating contractor in the administration of the management and operating (M&O) contract with Honeywell Federal Manufacturing and Technologies; directs the evaluation of the M&O contractor performance; provides leadership, supervision, planning, direction and coaching to KCSO staff; serves on NNSA Headquarters corporate boards/councils; and, serves as the DOE/NNSA representative for all matters concerning the operations of the Kansas City Plant.

Direct reports include the:

- Deputy Manager;
- Counsel;
- Assistant Manager, Office of Production and Project Management;
- Assistant Manager, Office of Quality Assurance; and,
- Assistant Manager, Office of Safety and Security.

Each Deputy and Assistant Manager directs and manages functional areas as assigned by the KCSO Manager to execute work at the Kansas City Plant, and satellite operations in New

Mexico and Fort Chaffee, Arkansas. The Assistant Managers direct and manage scientists, engineers or administrative personnel who may be organized into staffs, teams, or individuals to provide oversight of functional areas as assigned.

Deputy Manager

The Deputy Manager is responsible for integration of operational, programmatic, and technical activities and provides support to the KCSO Manager on all matters related to Kansas City Plant activities, including crosscutting KCSO activities such as strategic planning and leadership improvement initiatives. The Deputy Manager directs the Business Management Group. This group provides on-site contract administration through a contracting officer and is responsible for the negotiation and determination of the annual KCP contractor performance evaluation plans, the fee process, procurement and contracts, contractor industrial relations, KCSO administrative functions, KCP public affairs, Federal training and serves as the primary interface with KCSO employees regarding Federal employment.

Counsel

The KCSO counsel provides legal advice and staff work to the KCSO Manager in all areas of law and legal policy arising from the operation of the KCP. Specific areas include: oversight of the M&O contractor's legal program and litigation; M&O contract matters; ES&H compliance matters; technology transfer program issues; litigation oversight; and, other issues as requested by NNSA General Counsel. The counsel interfaces with KCSO management and staff, HQ and Service Center staff, NNSA General Counsel, Department of Justice, Honeywell FM&T Staff; and, federal, state, and local government representatives.

Contracting Officer

The KCSO Contracting Officer is the principal contracting advisor to the KCSO Manager. Duties include administering the prime contract between the DOE/NNSA and Honeywell Federal Manufacturing and Technologies (Honeywell FM&T), negotiating and issuing contract modifications there to such as fee and scope, changes to clauses, funding modifications, work authorizations and reimbursement authorizations. All direction to the contractor flows exclusively through the KCSO Contracting Officer and Contracting Officer Representatives.

Contracting Officer Representatives

KCSO Contracting Officer representatives (CORs) are KCSO staff, appointed in writing by the KCSO Contracting Officer, with responsibilities to provide on-site, day-to-day contract administration. CORs serve as the primary liaison between the KCSO Contracting Officer and Honeywell FM&T Honeywell FM&T and provide clarification and direction as specified in the prime contract. CORs ensure that the terms and conditions of the prime contracted are carried out.

Assistant Manager, Office of Production and Project Management

The Assistant Manager, Office of Production and Project Management (OPPM) directs the

programs for Directed Stockpile Work (DSW), Campaign Management, Required Technical Base and Facilities (RTBF), Construction Management, and Reimbursables Programs.

The DSW and Campaign Management Team monitors and reports weapon program status. The RTBF and Construction Management Team manages facilities and life cycle assets. The team also serves as the federal project management function for KCP construction projects. They interface with NNSA, General Services Administration, and other adjacent landowners. The Reimbursable Programs Team provides programmatic direction as well as cooperative research and development agreements, Fund-In agreements, Work for Others, and Russian Nonproliferation activities. The team also provides programmatic guidance for the Office of Secure Transportation program at Kansas City and Kirtland AFB.

Assistant Manager, Office of Quality Assurance

The Assistant Manager, Office of Quality Assurance performs the DOE Weapons Quality Assurance Agency function in accordance with QC-1 (DOE/AL, Quality Criteria), and provides technical expertise to support the Office of Safety and Security in administering the KCP Price Anderson Amendment Act (PAAA) Program. The Office of Quality Assurance is also responsible for maintaining the KCSO QA Program. The Office is divided into two teams. The Engineering Team provides engineering support and system/plant-wide surveys of Honeywell FM&T. The Product Acceptance Team provides hands-on product testing and process-based surveys of Honeywell FM&T.

Assistant Manager, Office of Safety and Security

The Assistant Manager, Office of Safety and Security provides oversight through the ES&H Program, and the Security and Information Systems Program. The environment element of the ES&H Programs ensures ongoing facility compliance with federal, state and local environmental laws, rules and regulations. The safety element primarily focuses on the contractor's effective and efficient compliance with the federal safety and health requirements contained in Title 29 of the Code of Federal Regulations; various DOE/NNSA Orders, Manuals, Guides and Policies; applicable state laws, rules, and regulations; and applicable industrial codes and standards. The industrial health element includes both industrial hygiene and occupational medicine. The Security and Information Systems Program provides day-to-day oversight of the safeguards and security program for the KCP. Includes are all aspects of physical security, property protection, classified material control, transportation security, information security, pro-force oversight, vulnerability assessments special access programs, and information management.

The Office of Safety and Security also provides day-to-day oversight of health physics, radiological protection, industrial hygiene and occupational medicine, industrial safety, transportation safety, firearm safety, emergency preparedness, chemical safety, fire protection, NEPA, environmental programs, and incident/occurrence reporting.

6. DELEGATION OF AUTHORITY

The KCSO receives its authority from assignments contained in NNSA FRAM, DOE's FRAM (DOE M 411.1-1B), DOE directives (i.e., Policies, Orders, Notices, and Manuals), NNSA Policy Letters, Department of Energy Acquisition Regulations (DEAR), and Title 10 of the Code of Federal Regulations (CFR). The KCSO Deputy and Assistant Managers and staff receive authority from assignments contained in the KCSO Quality Manual and QAP/FRA, KCSO procedures, and other documents that are written to implement/supplement DOE directives.

All delegations of authority are provided to the designee in writing. The delegation establishes a clear understanding between the delegating authority and the designee of the specific function delegated and all circumstances, under which the authority may be exercised, including any restrictions or prohibitions related to further delegation. The KCSO Quality Manual and KCSO Process Descriptions are an approved method for documenting delegations of authority.

7. OVERVIEW OF LINE MANAGEMENT INTERFACES

The KCSO Contracting Officer along with the Deputy and Assistant Managers ensure that the Prime Contract is administratively executed. The execution of the Contract must be consistent with the NNSA program direction as provided by the Head of Contracting Authority and/or the Contracting Officer (CO). The KCSO Manager must ensure that the KCSO provides sufficient direction and communication to Honeywell FM&T that promotes seamless DOE/NNSA direction and guidance and that KCSO personnel perform direct oversight of Honeywell FM&T through on-site monitoring and surveillance.

The KCSO staff and support organizations interface routinely on work related matters. Memoranda of Agreement with support organizations are sometimes developed to ensure there is a clear understanding of the nature and degree of support required and how and when that support is to be provided. The KCSO staff also communicates informally with their DOE/NNSA counterparts. Although major items, such as budgets, project execution plans, and review of directives, are formally transmitted, much of the day-to-day communication is informal.

The Head of Contracting Authority is presently assigned to the Deputy Director, Office of Procurement and Assistance Management, NNSA. This authority and responsibility was assigned from the Administrator, NNSA, on September 25, 2002. KCSO Contracting Officers are assigned to the Office of the Manager. The contracting officers are the principal advisors to the KCSO Manager on matters pertaining to the contract administration. Duties include administering the prime contract between DOE/NNSA and Honeywell FM&T, negotiating and issuing contract modifications, work authorizations and reimbursement authorizations.

The Contracting Officer appoints CORs and officially delegates certain actions to these appointees. A COR is an individual, designated by the Contracting Officer, to act as an

authorized representative for such functions as technical monitoring, inspection, and other functions of a more technical nature not involving a change in the scope, cost, terms or conditions of the contract. Each COR is allotted responsibilities detailed in the KCSO Quality Manual. CORs are designated by name and not position. The boundaries of designations are addressed in each COR delegation letter. The work performed by Honeywell FM&T in compliance with the terms of the Contract shall be subject to performance direction from the CORs as follows:

- (1) Directions to Honeywell FM&T which redirect the contract effort, shift work emphasis within work an area or a WA, require pursuit of certain lines of inquiry, fill in details or otherwise serve to accomplish the Statement of Work (SOW).
- (2) Provision of written information to Honeywell FM&T that assists in the interpretation of drawings, specification or technical portions of the work description.
- (3) Review and, where required by the contract, approval of technical reports, drawings, specifications and technical information to be delivered by the Honeywell FM&T to the Government under the contract.
- (4) Monitoring compliance with applicable environmental, safety, health and security requirements.

The execution of these contractual responsibilities and authorities, as described above, fulfills KCSO Line Management direction.

8. OTHER AGENCY INTERFACES

HQ's/NNSA mission organizations issue program direction to the KCSO. KCSO personnel are the on-site DOE/NNSA representatives and provide day-to-day management of site resources to achieve the mission using this program direction.

Headquarters - Defense Program (NA-10) provides oversight and guidance to the Site office on mission requirements. NA-124 works with the Site offices to achieve a mutual understanding of work and workload resource allocations the KCP.

The KCSO/NNSA Service Center (SC) Service Level Agreements document the arrangement between SC and the KCSO by which SC and the KCSO shall provide mutual support to one another. This arrangement reflects the mutual dependencies that currently exist between KCSO and SC organizations and leverages for skilled personnel resources to best suit each organization. The agreements address financial management, directives management, administrative services, legal services, public affairs, partnerships, contract administration, and program development, safeguards and security, environmental, safety, health, quality, and emergency management; environmental management, assets utilization, uranium and engineering services, diversity programs, and employee concerns.

Other Site Offices are contacted to assist the KCSO in meeting mission requirements. These Site Offices can support product builds and other interfaces (e.g., incoming reports on

damaged material) necessary to gain support of KCP program direction execution. The Service Level Agreement is a living document and will be reviewed for revisions at least annually.

Laboratories (e.g., Los Alamos, Lawrence Livermore, Sandia) are contacted to provide assistance in assessing the adequacy of assembly or disassembly operations on nuclear weapons components or the proper handling of nuclear weapon components (e.g., defects, etc.).

Other agencies such as the State of Missouri and the EPA provide oversight of environmental compliance with approved permits.

9. REQUIREMENTS

a. KCSO QAP/FRA

KCSO Manager, Deputy, Assistant Managers execute functions, responsibilities and authorities as described in KCSO Quality Manual, KCSO QAP/FRA, and KCSO procedures.

b. KCSO QAP/FRA Changes/Records

This QAP/FRA is referenced as a requirement within the KCSO Quality Manual. The Deputy and Assistant Managers will be responsible for changes and biannual updates in accordance with this section. Documentation of changes and reissues will be maintained.

- (1) Any KCSO staff members may request a change to the KCSO QAP/FRA.
- (2) The change to the KCSO QAP/FRA must be justified and this justification can be provided to the KCSO Manager or designee.
- (3) The change request must reflect impacts to the KCSO Quality Plan and KCSO QAP/FRA.
- (4) All changes must be approved by the KCSO Manager. Approved change requests will be maintained as official records.

c. Directives/Standards Change Control

The operating requirements directives process is applicable to all offices of the KCSO. The office of primary interest is the KCSO Assistant Manager who has responsibility for the subject directive. The KCSO functional manager is the employee who resides in the designated office of primary interest and owns the subject directive. The KCSO directives manager administers the directives program. The DOE review and comment system (REVCOM) is used to comment on draft directives. DOE Headquarters administers the electronic system which is used to solicit and consolidate comments of draft directives.

DOE orders and directives applicable to KCP are documented through the electronic operating requirement database maintained on the KCP command media. The prime contract between DOE/NNSA and Honeywell FM&T requires the contractor to comply with a set of “operating requirements” including all laws, regulations, DOE directives and best-in-class commercial standards as applicable to M&O contractors. The KCSO has segmented directives responsibility to site office functional managers who own and are responsible for directives in their functional area. KCSO functional managers ensure the accuracy and currency of the directives requirements relevant to their functional area.

Requirements are added to, or deleted, through written direction of a KCSO contracting officer. Requests for changes to the operating requirements database originate through official implementation instructions, a request by a KCSO functional manager or through a Honeywell FM&T request for consideration. All requests for changes are reviewed by KCSO functional managers and ultimately signed by a KCSO contracting officer.

DOE and NNSA requirements that are applicable to KCSO are maintained in the KCSO Quality Plan. Formal process for changing requirements is maintained.

d. Guiding Principles for Integrated Safety Management (ISM)

The ISMS guiding principles for DOE are identified and their relationships to KCSO Office operations are discussed in the chart below.

<u>Integrated Safety Management Guiding Principles</u>	<u>Kansas City Site Office</u>
a. <u>Line Management Responsibility for Safety</u>	<p>Essential Safety Management functions are assigned</p> <p>Contract requires Honeywell FM&T to define essential management functions</p> <p>Issue Stop Work order when Honeywell FM&T fails to resolve noncompliance with environmental, safety, and health requirements or fails to act to prevent substantial harm or imminent danger to the environment or health and safety of employees or the public</p> <p>Comply with safety standards and requirements and legal and contractual requirements for assigned functional areas providing assurance that workers, the public, and the environment are protected</p>
b. <u>Clear Roles and Responsibilities</u>	<p>Management and Safety Responsibilities for Approving the M&O Contractors ISMS and Other Binding Agreements that Implement ISM are Delineated</p> <p>Functions, Responsibilities, and Authorities are Assigned in the KCSO QAP and summarized in the KCSO FRAM in the Responsibilities section</p> <p>Relationships and Responsibilities for NNSA line, support, oversight, and enforcement organizations are discussed in the Overview of KCSO Line Management Interfaces and Other Agency Interfaces sections and are identified in the Responsibilities Section .</p> <p>Coordination of Line Management direction from multiple Program Offices is addressed in the Other Agency Interfaces section</p>
c. <u>Competence Commensurate with Responsibilities</u>	<p>A Qualification and Training Program is maintained to ensure KCSO personnel are qualified to carry out their assigned responsibilities</p> <p>Qualification Standards and Qualification Cards have been established by position for KCSO personnel to guide and document qualifications, where required</p>
d. <u>Balanced Priorities</u>	<p>Mission-to-Work Objectives and Funding Priorities are established based upon NNSA program direction</p> <p>The KCSO Operational Plan defines the KCSO goals and objectives, consistent with the DOE and NNSA Strategic Plans, and within the resources allocated</p> <p>Performance Expectations are communicated through the Performance Evaluation Plan. Specific CPAF/PBI Agreements are Negotiated in the Performance Evaluation Plan and performance is evaluated annually</p> <p>Environment, Safety and Health activities are integrated into work planning and execution as discussed in the Core Functions, Responsibilities and Authorities section</p> <p>Work is prioritized to ensure that mission and safety expectations for the site are met within available budget and resources</p>
e. <u>Identification of Safety Standards and Requirements, and Hazard Controls Tailored to Work Being Performed</u>	<p>Standards are applied to work in a defined process and tailored to KCP hazards</p> <p>Standards are formally assigned to the contract by KCSO program manager and contracting officer</p>

f. Operations Authorization

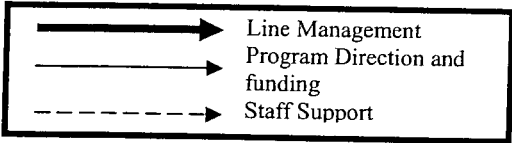
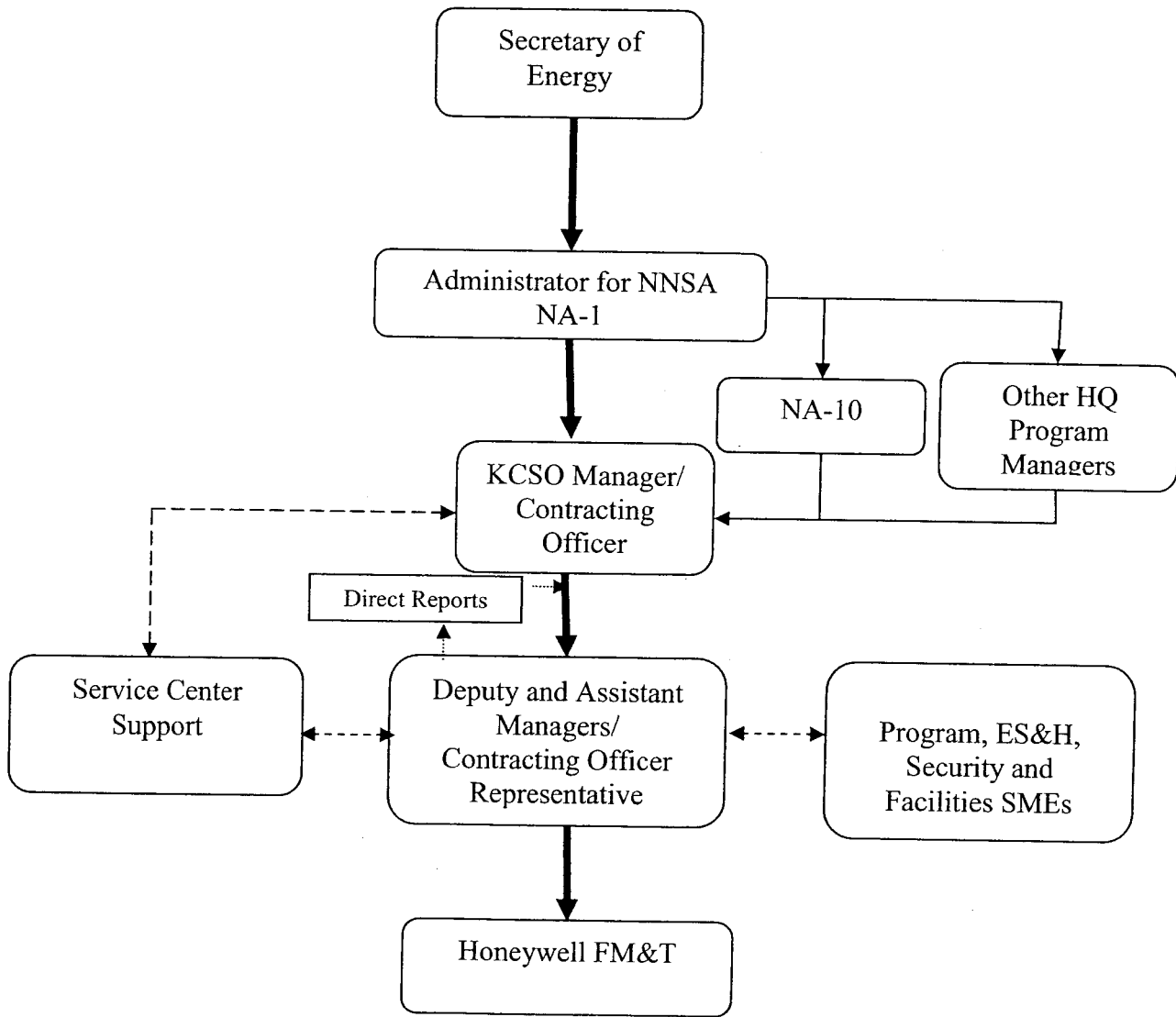
An ES&H Management Plan which includes Thresholds for Authorization is reviewed and approved by KCSO

Operations are monitored by KCSO Line Management Oversight that involves system approvals, formal assessments, For Cause Reviews, and Operational Awareness

Establish Processes and process metrics are established based on risk and monitored by KCSO Staff through the Contractor Assurance System (CAS)

Appendix A

Kansas City Site Office Flow of Responsibilities and Authorities



Appendix B
KCSO Roles and Responsibilities for Safety Management

Assigned Duty	Responsible Office	Responsible Official	Implementing Procedure
Federal Technical Capabilities Program	OOM	Administrative Officer	AL Technical Qualification Program Plan 02-01 KCSO PD Process for Training and Qualification
Federal Technical Capabilities Agent	OSS	AAM, OSS	NNSA Technical Qualification Program Plan
Kansas City Plant Budget	OPPM	Financial & Budget Specialist	06-01 KCSO PD Budget Oversight Process
Kansas City Site Office Budget	OOM	Budget Analysis	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans 06-01 KCSO PD Budget Oversight
Contractor Training Program	OOM	Administrative Officer	Operational Awareness section of KCSO Line Management Oversight Plan
Mission Work Plans	OPPM	AAM, OPPM	08-01 KCSO PD Execution Plan for DSW and Campaigns 08-02 KCSO PD Campaigns Process
Security Work Plans	OSS	Security Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans 10-01 KCSO PD Security Plans
Directives Review	OOM	Contract Specialist	03-03 KCSO PD Directive Process, 01-02 KCSO PD Process for Reviewing Draft NNSA Policies, Requirements, and Orders
Contract Management	OOM	Contracting Officer	03-02 KCSO PD Contract Modification Process
Contractor Performance Award Fee	OOM	Contracting Specialist	03-31 KCSO PD Performance Evaluation Plan 03-33 KCSO PD Award Fee Performance Evaluation Report Process 03-32 KCSO PD Incentive Validation Process
Review of Integrated Safety Management System	OSS	ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
Functions, Responsibilities, and Authority Manual (FRAM)	OSS	AAM, OSS	KCSO QAP Section XI
Line Oversight and Contractor Assurance System	OSS	AAM, OSS	Operational Awareness section of KCSO Line Management Oversight Plan
KCSO Assessment	OQA	Quality Eng. Program Manager	03-34 KCSO PD Assessment & Survey (QAS) of Contractor Activities Process
KCSO Operational Awareness	OSS	Emergency Operational Manager	Operational Awareness section of KCSO Line Management Oversight Plan
KCSO Operational Plan	OOM	Administrative Officer	04-01 KCSO PD Operational Planning Process
Emergency Preparedness	OSS	Emergency Operations Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
Price-Anderson Amendment Act	OSS	ES&H Program Manager	Operational Awareness section of KCSO Line Management Oversight Plan
Radiation Protection Plan Review and Approval	OSS	Industrial Health Manager	08-10 KCSO PD Approval of Contractor

			Systems, Submissions, and Plans
Federal Occupational Safety and Health Program	OSS	Industrial Health Manager	KCSO Worker Protection Management Plan
Facilities Oversight and Startup	OPPM	RTBF & Construction Program Manager	FM&T 22.01.01.01.02 How To Perform and Approve a Prestart Review
Contractor's Quality Assurance Plan Review and Approval	OQA	AAM, OQA	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
Contractor's Corrective Action System	OQA	Quality Eng. Program Manager	03-14 KCSO PD Process for Contractor Corrective Action Approval and Validation
Lessons Learned	OSS	Emergency Operations Manager	Operational Awareness section of KCSO Line Management Oversight Plan
Occurrence Reporting	OSS	Emergency Operations Manager	KCSO Procedure OSS-002-001 Daily Operations and Events Reporting
ES&H Oversight	OSS	AAM, OSS	03-34 KCSO PD Assessment & Survey (QAS) of Contractor Activities Process 03-34-04 KCSO WI OSS Oversight
KCSO Policy	OOM	KCSO Manager	01-03 KCSO PD Development of KCSO Policy
KC SO Self Assessment	OQA	AAM, OQA	01-10 KCSO Internal Audit Process
KCSO Quality Assurance Plan/ISO	OQA	AAM, OQA	KCSO QAP/Business Model including ISO Process Descriptions/Work Instructions
Facilities and Construction Management	OPPM	RTBF & Construction Program Manager	Operational Awareness section of KCSO Line Management Oversight Plan
Ten Year Comprehensive Plan	OPPM	RTBF & Construction Program Manager	NNSA's Ten Year Comprehensive Site Planning guidance 08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
Work Authorization	OMM	Budget Analyst	8 KCSO PD Work Authorization
Environmental Restoration	OSS	Environmental Restoration Manager	KCSO Environmental Restoration Baseline
Environmental Permits	OSS	ES&H Program Manager	09-01 KCSO PD Environmental Permits

5	Define Scope of Work— Translate Mission into Work, Set Expectations	*Authorize ISMS verifications to ensure ISMS is implemented and maintained at NNSA facilities.	Yes		OSS, ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
6	Define Scope of Work— Translate Mission into Work, Set Expectations	Develop work plans, including scope, schedule, and funding allocations for each fiscal year.	Yes		OPPM-AAM for Mission Work Plans OSS-Security Program Manager for Security Work Plans	08-01 KCSO PD Execution Plan for DSW and Campaigns 08-02 KCSO PD Campaigns Process
7	Define Scope of Work— Translate Mission into Work, Set Expectations	These plans should reflect mission assignments to the field and by facilities, projects, and programs.	Yes		OPPM-AAM for Mission Work Plans OSS-Security Program Manager for Security Work Plans	08-01 KCSO PD Execution Plan for DSW and Campaigns 08-02 KCSO PD Campaigns Process
8	Define Scope of Work— Translate Mission into Work, Set Expectations	Assist in the development/review of guidance documents that promulgate expectations for field element activities and performance including Rules, NNSA and DOE Policies, Orders, Notices, Manuals, Guides, and Technical Standards.	Yes		Contract Specialist	03-03 KCSO PD Directive Process, 01-02 KCSO PD Process for Reviewing Draft NNSA Policies, Requirements, and Orders
9	Define Scope of Work— Translate Mission into Work, Set Expectations	Prepare, award and administer contracts that establish clear expectations and performance measures with requirements for annual updates.	Yes		Contract Specialist	03-02 KCSO PD Contract Modification Process
10	Define Scope of Work— Translate Mission into Work, Set Expectations	Monitor contractor performance to assess whether performance expectations have been met.	Yes		OPPM- AAM OSS- AAM OQA-AAM	KCSO Line Management Oversight Plan
11	Define Scope of Work— Translate Mission into Work, Set Expectations	As Contracting Officer: Negotiate with each contractor, in consultation with Deputy Administrator (NA-10 only), the set of Directives or provisions of Directives, if any, to be included in the	Yes		Contract Specialist	03-03 KCSO PD Directive Process

		contract.				
12	Define Scope of Work— Translate Mission into Work, Set Expectations	· Approve and issue contracts that meet contract regulations and provide clear expectations and performance measures to contractors regarding work to be performed for the mission including safety requirements.	Yes		Contract Specialist	03-02 KCSO PD Contract Modification Process
13	Define Scope of Work— Translate Mission into Work, Set Expectations	· Determine annually that contractor safety management systems and systems requirements are current, valid, and appropriately reflected in the implementation procedures.	Yes		OSS, ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
14	Define Scope of Work— Translate Mission into Work, Set Expectations	· Determine the need for team review of the contractor's safety management system and revisions thereto.	Yes		OSS, ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
15	Define Scope of Work— Translate Mission into Work, Set Expectations	· Approve safety management systems and revisions thereto (48 CFR 970).	Yes		OSS, ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans
16	Define Scope of Work— Translate Mission into Work, Set Expectations	· Incorporate approved Standards into contract requirements.	Yes		Contract Specialist	03-03 KCSO PD Directive Process
17	Define Scope of Work— Translate Mission into Work, Set Expectations	· Prepare budget execution documents in accordance with the NNSA PPBE process to allocate resources to contractors.	Yes		AAM/OPPM, Financial & Budget Specialist	06-01 KCSO PD Budget Oversight Process
18	Define Scope of Work— Translate Mission into Work, Set Expectations	Prepare Site Office FRAM, submit for approval by the Deputy Administrator, and implement FRA documents for Site Offices that delineate how the applicable responsibilities and authorities in the NNSA FRAM are performed.	Yes		OSS-AMM	KCSO QAP Section XI
19	Define Scope of Work— Translate Mission into Work, Set Expectations	Revise FRA documents within 90 days of the issuance of revisions of the NNSA FRAM and following local	Yes		OSS-AMM	KCSO QAP Section XI

		organizational changes.					
20	Define Scope of Work— Translate Mission into Work, Set Expectations	Deputy Administrator approval is only needed for significant Site FRAM changes.	No				Deputy Administrators action
21	Define Scope of Work— Translate Mission into Work, Set Expectations	Also, obtain approval from the Deputy Administrator for Site FRAMs that have QAP elements integrated.	Yes		OSS-AMM	KCSO QAP Section XI	
22	Define Scope of Work— Translate Mission into Work, Set Expectations	Ensure that the responsibility, authority, and accountability for operation and maintenance of all NNSA facilities are clearly defined, appropriately assigned, and executed.	Yes		OOM- Site Manager	KCSO FRAM/QAP	
23	Define Scope of Work— Translate Mission into Work, Set Expectations	Conduct line oversight of safety management systems to ensure effective implementation and maintenance.	Yes		OSS-AAM, ES&H Program Manager	03-34 KCSO PD Assessment & Survey (QAS) of Contractor Activities Process 03-34-04 KCSO WI OSS Oversight	
24	Define Scope of Work— Translate Mission into Work, Set Expectations	Ensure that contractors describe, document, implement, and maintain their safety management systems.	Yes		OSS, ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	
25	Define Scope of Work— Translate Mission into Work, Set Expectations	Ensure that the safety management system adequately prioritizes work to ensure that, when implemented, mission and safety expectations for the site are met within available budget and resources.	Yes		OSS, ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	

26	Define Scope of Work— Translate Mission into Work, Set Expectations	Review and support development of expected performance objectives and related Deputy Administrator goals and priorities.	Yes		Contract Specialist	03-31 KCSO PD Performance Evaluation Plan03-33 KCSO PD Award Fee Performance Evaluation Report Process03-32 KCSO PD Incentive Validation Process	
27	Analyze Hazards and Develop and Implement Controls	Direct the contractor to propose site- or facility-specific standards tailored to the work and the hazards and provide this documentation to the Deputy Administrator for information (or for approval in the authorization agreement and in the contract in the case of Hazard Category 1 nuclear facilities).	No				KCP not a nuclear facility. Directives are incorporated unless NAP-5 process convened.
28	Analyze Hazards and Develop and Implement Controls	Ensure that the analysis provided by the contractor properly covers the hazards associated with the work, is consistent with its safety management system, and provides sufficient information for the selection of safety standards and controls.	Yes		OSS, ES&H Program Manager	03-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	
29	Analyze Hazards and Develop and Implement Controls	Ensure that hazards surveys and hazards assessments for emergency planning purposes are adequately performed and documented in accordance with the requirements of DOE O 151.1A, Comprehensive Emergency Management System except at sites where exemption has been granted or the Order is not applicable.	Yes, partially		OSS- Emergency Operations Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	DOE 151.1 not applied to KCP under NAP-5 Process. However, Hazard Surveys prepared.
30	Analyze Hazards and Develop and Implement Controls	Approve and forward approved hazards surveys and hazards assessments to the Deputy Administrators and Director of Emergency Operations, as appropriate.	Yes		OSS- Emergency Operations Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	DOE 151.1 not applied to KCP under NAP-5 Process. However, hazard surveys are

							reviewed, approved and submitted.
31	Analyze Hazards and Develop and Implement Controls	Ensure that a documented PAAA coordination process exists in accordance with NNSA polices and procedures, including a process for tracking and verification of closure of contractor corrective actions.	Yes, partially		OSS- ES&H Manager	KCSO Line Management Oversight Plan	PAA does not apply to facility safety but applies to some manufactured components. No implementing instructions.
32	Analyze Hazards and Develop and Implement Controls	Review and approve the ES&H requirements to be included in the contracts.	Yes		OSS-AAM, ES&H Program Manager	03-03 KCSO PD Directive Process	
33	Analyze Hazards and Develop and Implement Controls	Ensure that the hazard analyses for Hazard Category 1, 2, and 3 nuclear facilities meet the requirements of 10 CFR 830.	No				KCP has no nuclear facilities
34	Analyze Hazards and Develop and Implement Controls	For Hazard Category 1 nuclear facilities, ensure that appropriate safety requirements in necessary functional areas are included in the contracts and in the authorization agreement as directed by the Deputy Administrator.	No				KCP has no nuclear facilities
35	Analyze Hazards and Develop and Implement Controls	*Approve final nuclear facility/activity hazard categorization level based on input from NNSA line managers and contractors regarding the type and amounts of hazards, and the requirements of 10 CFR 830.	No				KCP has no nuclear facilities
36	Analyze Hazards and Develop and Implement Controls	Approve the nuclear safety design criteria selected for the preliminary DSAs for Hazard Category 1, 2, and 3 nuclear facilities if they are not consistent with DOE O 420.1, <i>Facility Safety</i> , as required by 10 CFR 830.	No				KCP has no nuclear facilities
37	Analyze Hazards and Develop and Implement Controls	*Direct the contractor to prepare documentation for controls for the prevention and mitigation of hazards (including Technical Safety Requirements for Hazard Category 1, 2 and 3 nuclear facilities). Review the adequacy of the controls and their documentation.	No				KCP has no nuclear facilities

38	Analyze Hazards and Develop and Implement Controls	Direct the contractor to prepare RPPs, USQ procedures, preliminary DSAs, and DSAs in accordance with 10 CFR 830 and 835.	Yes		OSS- Industrial Health Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	RPP for radiological activities only.
39	Analyze Hazards and Develop and Implement Controls	*Review and approve the following: RPPs for DOE activities as required in 10 CFR 835; USQ procedures for Hazard Category 1, 2, and 3 nuclear facilities; and preliminary DSAs and DSAs for Hazard Category 2 and 3 nuclear facilities, including the nuclear safety design criteria, where required by 10 CFR 830.	Yes		OSS- Industrial Health Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	RPP for radiological activities only.
40	Analyze Hazards and Develop and Implement Controls	Obtain EH review and Deputy Administrator approval if the provisions of 10 CFR 830 for DSA methodologies are not used.	No				KCP has no nuclear facilities
41	Analyze Hazards and Develop and Implement Controls	Send recommendation for approval or disapproval of DSAs and preliminary DSAs for Hazard Category 1 nuclear facilities, including the nuclear safety design criteria, to the Deputy Administrator with comments.	No				KCP has no nuclear facilities
42	Analyze Hazards and Develop and Implement Controls	Respond to Principal Deputy Administrator, Deputy Administrator, ES&H Advisor, Director of Emergency Operations, Associate Administrator for Infrastructure and Security (AAIS), or EH comments.	Yes		OSS- Industrial Health Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	RPP for radiological activities only.
43	Analyze Hazards and Develop and Implement Controls	*Approve the Technical Safety Requirements and other hazards controls for Hazard Category 2 and 3 nuclear facilities and ensure sufficient funding for implementation.	No				KCP has no nuclear facilities
44	Analyze Hazards and Develop and Implement Controls	*For Hazard Category 2 and below nuclear facilities and accelerators, approve the safety basis, and prepare a safety evaluation report.	No				KCP has no nuclear facilities
45	Analyze Hazards and Develop and Implement Controls	Review and provide recommendations to the Deputy Administrator on requests for Exemptions to 10 CFR Parts 830 and 835.	Yes		OSS- Industrial Health Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	RPP for radiological activities only.

46	Analyze Hazards and Develop and Implement Controls	If necessary, pursue Exemptions from DOE requirements, local, State, or other Federal agencies.	No				No State radiological requirements apply to KCP non nuclear operations.
47	Analyze Hazards and Develop and Implement Controls	Coordinate with contractor and Deputy Administrator.	Yes		OSS- Industrial Health Manager	08-10 KCSO PD Approval of Contractor Systems, Submissions, and Plans	RPP for radiological activities only.
48	Analyze Hazards and Develop and Implement Controls	Provide line management oversight and ensure the implementation of hazards mitigation programs and controls.	Yes		OSS- AAM	KCSO Line Management Oversight Plan	
49	Analyze Hazards and Develop and Implement Controls	Monitor the proper implementation of controls, including contractor processes for USQs and configuration management and compliance with the Technical Safety Requirements.	No				KCP has no nuclear facilities
50	Analyze Hazards and Develop and Implement Controls	Identify any other facilities for which hazard controls must be identified and documentation prepared (e.g., accelerators and major systems).	No				KCP does not have high or medium risk facilities.
51	Analyze Hazards and Develop and Implement Controls	As Contracting Officer, determine appropriate protocol based on work and hazard; append approved authorization agreement to or modify the affected contract to contain its provisions; and establish requirements to ensure that authorization agreements are maintained up-to-date.	No				As a non nuclear facility, KCP does not have authorization agreements.
52	Analyze Hazards and Develop and Implement Controls	*Ensure that all Hazard Category 2 nuclear facilities have an up-to-date Authorization Agreement.	No				KCP has no nuclear facilities
53	Confirm Readiness, Quality Assurance, Collect Feedback	Implement a Federal Employee Occupational Safety and Health (FEOSH) program for NNSA site employees.	Yes		OSS- Industrial Health Manager	KCSO Worker Protection Management Plan	
54	Confirm Readiness, Quality Assurance, Collect Feedback	Ensure that readiness reviews are conducted in accordance with DOE O 425.1C, <i>Startup and Restart of Nuclear Facilities</i> .	No				KCP has no nuclear facilities
55	Confirm Readiness, Quality Assurance, Collect Feedback	Review and approve contractor Startup Notification Report in accordance with	No				KCP has no nuclear facilities

		DOE O 425.1C.					
56	Confirm Readiness, Quality Assurance, Collect Feedback	Forward Startup Notification Reports to Deputy Administrator in accordance with DOE O 425.1C.	No				KCP has no nuclear facilities
57	Confirm Readiness, Quality Assurance, Collect Feedback	Exercise startup authority for nuclear facilities in accordance with the requirements contained in DOE O 425.1B for all cases except those designated for the Secretary of Energy/NNSA Administrator.	No				KCP has no nuclear facilities
58	Confirm Readiness, Quality Assurance, Collect Feedback	Headquarters retains startup authority for new Category 2 nuclear facilities.	No				KCP has no nuclear facilities
59	Confirm Readiness, Quality Assurance, Collect Feedback	Determine the appropriate level of readiness necessary for the startup of non-nuclear facilities, ensure that it has been attained, and exercise all startup authority.	Yes		OPPM-RTBF and Construction Program Manager	FM&T 22.01.01.01.02 How To Perform and Approve a Prestart Review	
60	Confirm Readiness, Quality Assurance, Collect Feedback	Perform line management oversight of contractors' worker, public, environment, and facility protection programs and maintain day-to-day operational oversight of contractor activities at applicable facilities through Facility Representatives.	Yes		OPPM- AAM OSS- AAM OQA-AAM	KCSO Line Management Oversight Plan	KCSO does not have a Facility Representative Program
61	Confirm Readiness, Quality Assurance, Collect Feedback	*Review and approve contractors' QAPs, and ensure QAPs for nuclear facilities meet the requirements of 10 CFR 830, and are integrated with the contractor's safety management programs.	No				QAPs not required at supplier facilities such as KCP
62	Confirm Readiness, Quality Assurance, Collect Feedback	Ensure that contractors implement QAPs.	No				QAPs not required at supplier facilities such as KCP
63	Confirm Readiness, Quality Assurance, Collect Feedback	Develop and implement site QAPs or integrate and implement QA elements through site FRAM and FRA documents.	No				QAPs not required at supplier facilities such as KCP
64	Confirm Readiness, Quality Assurance, Collect Feedback	Submit integrated site FRAM/QAP to the Deputy Administrator for review and concurrence.	No				QAPs not required at supplier facilities such as KCP

65	Confirm Readiness, Quality Assurance, Collect Feedback	Submit site office QAPs to the Deputy Administrator for approval.	No				QAPs not required at supplier facilities such as KCP
66	Confirm Readiness, Quality Assurance, Collect Feedback	Direct contractors to develop and implement a lessons learned program.	Yes		OSS-Emergency Operations Manager	KCSO Line Management Oversight Plan	
67	Confirm Readiness, Quality Assurance, Collect Feedback	The program should include analysis and trending of events.	Yes		OSS-Emergency Operations Manager	KCSO Line Management Oversight Plan	
68	Confirm Readiness, Quality Assurance, Collect Feedback	Monitor and assess contractor's lessons learned program.	Yes		OSS-Emergency Operations Manager	KCSO Line Management Oversight Plan	
69	Confirm Readiness, Quality Assurance, Collect Feedback	Participate in the DOE-wide sharing of lessons learned.	Yes		OSS-Emergency Operations Manager	KCSO Line Management Oversight Plan	
70	Confirm Readiness, Quality Assurance, Collect Feedback	*Require contractors to report occurrences on ORPS.	Yes		OSS-Emergency Operations Manager		no implementing instructions
71	Confirm Readiness, Quality Assurance, Collect Feedback	Review and approve reports, as delegated, including proposed corrective actions and lessons learned.	Yes		OSS-Emergency Operations Manager		no implementing instructions
72	Confirm Readiness, Quality Assurance, Collect Feedback	Review ORPS reports from other similar sites to detect potential improvements and means of averting occurrences.	Yes		OSS-Emergency Operations Manager		no implementing instructions
73	Confirm Readiness, Quality Assurance, Collect Feedback	As part of overall issue management, review the findings of assessments to evaluate their safety significance and ensure that appropriate priorities and resources are assigned to corrective actions.	Yes		OPPM- AAM OSS- AAM OQA-AAM	03-14 KCSO PD Process for Contractor Corrective Action Approval and Validation	
74	Confirm Readiness, Quality Assurance, Collect Feedback	Ensure that duly authorized independent oversight personnel have unfettered access to information and facilities, consistent with safety and security requirements.	Yes		OSS- AAM		no implementing instructions
75	Confirm Readiness, Quality Assurance, Collect Feedback	Monitor contractor reporting of potential nuclear safety violations and non-compliances with nuclear safety Rules to the Office of Enforcement and Investigation for review under the provisions of 10 CFR Part 820.	Yes, partially		OSS- ES&H Manager	KCSO Line Management Oversight Plan	PAA does not apply to facility safety but applies to some manufactured components.

76	Confirm Readiness, Quality Assurance, Collect Feedback	Provide information and support investigations.	Yes, partially		OSS- ES&H Manager		PAA does not apply to facility safety but applies to some manufactured components.
77	Confirm Readiness, Quality Assurance, Collect Feedback	Participate in enforcement conferences with the Office of Enforcement and Investigation.	Yes, partially		OSS- ES&H Manager		PAA does not apply to facility safety but applies to some manufactured components.
78	Confirm Readiness, Quality Assurance, Collect Feedback	Ensure implementation of the CAP and assign a cognizant line manager to review CAPs for assurance that issues raised in formal independent assessment reports are addressed.	Yes, partially		OSS- ES&H Manager		PAA does not apply to facility safety but applies to some manufactured components.
79	Confirm Readiness, Quality Assurance, Collect Feedback	Ensure the status of corrective actions in the DOE Corrective Action Tracking System (CATS) is updated.	Yes		OSS- ES&H Manager	03-14 KCSO PD Process for Contractor Corrective Action Approval and Validation	
80	Confirm Readiness, Quality Assurance, Collect Feedback	Coordinate with the contractor and Headquarters elements as necessary, in order to ensure all completed corrective actions have been verified by persons with sufficient independence from those who performed the work described in the CAP.	Yes		OSS- ES&H Manager		no implementing instructions
81	Confirm Readiness, Quality Assurance, Collect Feedback	If delegated, approve CAPs within 60 calendar days (for OA evaluations, approve CAPs within 30 calendar days) of the issuance of the formal independent oversight assessment report.	Yes		OSS- ES&H Manager		no implementing instructions
82	Confirm Readiness, Quality Assurance, Collect Feedback	If OA provides comments on an approved CAP, determine whether the CAP needs to be revised to address those comments, and revise the CAP appropriately.	Yes		OSS- ES&H Manager		no implementing instructions

3/24/2004

83	Confirm Readiness, Quality Assurance, Collect Feedback	Perform management assessments of contractors to evaluate their success in doing work safely.	Yes		OPPM- AAM OSS- AAM OQA-AAM	KCSO Line Management Oversight Plan	
84	Confirm Readiness, Quality Assurance, Collect Feedback	Appraise performance of the contractor against formally established ES&H and emergency management performance measures and other ES&H and emergency management performance indicators, and take appropriate action.	Yes		OPPM- AAM OSS- AAM OQA-AAM	KCSO Line Management Oversight Plan	
85	Confirm Readiness, Quality Assurance, Collect Feedback	The adequacy of the contractor self-assessment process, and assessments of safety system operability and programs that support system operability should be specifically appraised.	No				KCP has no defined safety systems for nuclear operations.

KCSO PLAN AND SCHEDULE FOR
REVISING SITE OFFICE PROCEDURES

Applicable procedures have been already revised to reflect the responsibilities and authorities of current FRAM.