

[DOE RIC LETTERHEAD]

July 3, 1997

The Honorable Mr. John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W., Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

**U.S. DEPARTMENT OF ENERGY RICHLAND OPERATIONS OFFICE (RL),
ENVIRONMENT, SAFETY AND HEALTH (ES&H) POLICIES**

RL is committed to the safe and responsible performance of our primary missions at Hanford. The development of an Integrated Safety Management System (ISMS) is an important step in improving this performance. One of the goals established for the ISMS currently under development is to consolidate the best of numerous separate initiatives including Defense Nuclear Facilities Safety Board Recommendation 95-2, ISO 14000 Environmental Management System, the Chemical Manufacturers Association Responsible Care® Program, the Voluntary Protection Program, and Enhanced Work Planning. Thus the ISMS, when in place, will represent a single management system for ES&M, encompassing the best elements of these separate initiatives.

An essential element of the ISMS is a sound ES&H policy which clearly states the ES&H goals of senior management such that all employees know and understand them. Accordingly, the RL management team has adopted the attached ES&H policies which represent the RL philosophy and approach to how work should be conducted at Hanford. They have been provided to RL management and staff for implementation and to the Hanford Contractors as guidance for reference and use in the development of safety management systems.

If you have any questions, please contact me or your staff may contact Bob DeLannoy, of the Performance Assessment Division, on (509) 376-8980.

Sincerely,

John Wagoner
Manager

PAD:CRD

Attachment

[DOE RIC OPS]

POLICY FOR ENVIRONMENT, SAFETY AND HEALTH

The highest priority of the Department of Energy Richland Operations Office (RL) is to achieve daily excellence in protection of the worker and the public and in stewardship of the environment, both on and off the Hanford Site. By meeting the most rigorous standards, we will provide safe and healthful workplaces and protection of the environment in all RL activities. Fundamental to the attainment of this policy are personal commitment and accountability, mutual trust, open communications, continuous improvement, worker involvement, and full participation of all interested parties. Consistent with our Strategic Plan, we will reduce accidents, radiological and toxicological exposures, and regulatory non-compliances.

This policy will be incorporated into the RL Division Director Mission/Policy Statements and the resulting requirements will become part of the RL Directives System and the RL Authorities and Responsibilities Manual (ARNI). RL managers and staff will be held accountable to this policy via Position Descriptions and Performance Appraisal systems.

This policy will be incorporated into all work conducted on the Hanford Site through requirements included in RL's contracts for the work. All contractors and their subcontractors will be held accountable through measurable performance indicators.

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Richland Operations Office

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Peter M. Knollmeyer, Acting Assistant
Manager for Facility Transition

Robert M. Rosselli, Assistant Manager
for Science and Technology Management.

It is the policy of the Department of Energy Richland;Operations Office (RL) to act as a responsible steward of the environment. This stewardship will be based on the principles of ecosystem management and sustainable development. Protection of the environment and of the public health is the primary consideration in all RL activities. Environmental, mission, and financial stewardship are integrated into the planning and execution of work.

To foster the stewardship. RL will:

- Consider the impacts of all its activities on the environment;
- Work together with its contractors, regulators, stakeholders, and the Indian Tribes to carry out this policy;
- Adopt cost-effective practices that eliminate or minimize negative environmental impacts;

- Manage programs and projects in a way that prevents pollution and is protective of the environment and public health;
- Define, prioritize and mitigate existing environmental problems; and
- Anticipate and address potential future environmental problems before they pose a threat.

All Hanford employees will be responsible environmental stewards by:

- Ensuring that Hanford operations are carried out in an environmentally sound manner that limits risks to the environment and protects the public health;
- Integrating environmental considerations into their daily work and aggressively striving to comply with the applicable regulations that address the natural, archeological, cultural, historical, public health, and social environment;
- Carrying out the work that they are responsible for in a cost-effective manner consistent with this policy and in compliance with regulatory and permit requirements;
- Seeking out and integrating pollution prevention, resource conservation, waste minimization and environmental impact considerations into all planning, decision-making, and work conducted;
- Looking for opportunities to improve environmental management;
- Promptly reporting environmental incidents and deficiencies that they observe; and
- Utilizing alternative nontoxic materials and altering practices to minimize the use and release of hazardous materials to the environment.

John D. Wagoner, Manager
Richland Operations Office

Paul W. Kruger, Director
Office of Environment, Safety and Health

James E. Rasmussen, Director
Environmental Assurance, Permits and Policy Division

QUALITY, SAFETY AND HEALTH POLICY

It is the policy of the Department of Energy Richland Operations Office (RL) that Hanford operations be conducted in a manner which effectively provides for the health and safety of employees and the general public, and achieves the highest quality results

for site activities. Protection of personnel, the assurance of public health, and the consistent application of high quality work processes in conjunction with financial stewardship are primary considerations in RL activities. Requirements associated with this policy will be incorporated into the contracts for all work conducted at the Hanford Site.

In meeting this policy. RL will:

- Establish and maintain, from the lowest to the highest levels, management involvement and accountability for quality, safety and health;
- Provide personnel training such that work activities and operations may be conducted without an adverse impact on quality, safety and health performance;
- Ensure work activities are conducted in a high quality, safe, and healthful manner through compliance and implementation of recognized standards and requirements, and through monitoring of site operations;
- Proactively involve the Hanford workforce in all safety and health policy/program development and work planning activities; and
- Ensure personnel are appropriately assigned to medical monitoring programs based on the identified or potential hazards of the work activities.

Consistent with this policy. it is expected that:

- RL's line organizations will be fully responsible and accountable for the adequate and effective implementation of quality, safety and health processes and of their programs at the Hanford Site. This includes all quality, safety and health aspects of the RL programs and of their contractors' programs at all levels from their management systems down to worker performance;
- RL's Office of Environment, Safety, and Health (ESH) will be available to proactively assist the line organizations to complement them in the execution of their quality, safety, and health responsibilities. This assistance will include cooperative activities such as working in conjunction with the line organizations to develop quality, safety and health policies, to identify and facilitate resolution of cross-programmatic compliance issues, and to monitor contractor implementation of quality, safety and health programs;
- All Contractor organizations will ensure that requirements and related concepts of sound quality, safety and health fundamentals are fully incorporated into all work processes and site operations; and
- All employees working on the Hanford Site are accountable to ensure that every operation and activity is conducted in a safe manner.

PERFORMANCE ASSURANCE POLICY

It is the policy of the Department of Energy Richland Operations Office (RL) to routinely and systematically assess quality, environmental stewardship, and protection of worker and public safety and health, and other functions at the Hanford Site to ensure that these factors are inherent in the planning and execution of work.

The primary emphasis of RL is on effective and accurate self-assessment by each contractor, with RL focusing its oversight on the contractors' self-assessment and internal independent assessment processes, and with targeted field sampling to sufficiently verify program effectiveness and compliance issues.

To carry out this policy. RL will:

- Incorporate self-assessment and independent assessment requirements in RL's contracts for work performed at the Hanford Site including measurable performance indicators for these programs;
- Establish oversight and verification functions to ensure that RL operations are being planned and conducted in a manner which protects human health and the environment. Oversight and verification will be based on performance, compliance and risk-based standards reviews and will be conducted in accordance with recognized industry and DOE-complex methodologies for audits, assessments and evaluations;
- Perform oversight activities using established statutes, regulations, orders, and Hanford policies, directives and implementation guidance; and
- Work together within RL and with the Hanford contractors to coordinate oversight activities and resources to eliminate redundant efforts and to provide efficient and cost effective systems for verifying and improving Hanford Site performance.

Consistent with this policy, it is expected that:

- RL's line operations organizations will be responsible for verifying implementation of adequate contractor self-assessment and oversight processes for environment, safety and health, and other functions within their programs. This would include identification of applicable requirements and potential hazards, planning and implementation of oversight and assessment activities, and subsequent utilization of oversight and assessment results to mitigate hazards and to identify programmatic improvements for consideration;
- RL's Office of Environment, Safety, and Health (ESH), through its Performance Assessment Division (PAD), will conduct the targeted field verification needed to sufficiently verify the contractors' assessment program effectiveness and environment, safety, and health (ES&H) performance at Hanford. As requested, PAD will support the RL line organization self-assessment and contractor oversight processes; and
- All contractor organizations will be responsible for establishing integrated assessment systems for ES&H and other functions for their scope of work. These systems will identify applicable requirements and potential hazards, plan and implement assessment

activities, and utilize assessment results to mitigate hazards and to identify beneficial programmatic improvements.

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Gerry M. Bell, Director
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