



**The Deputy Secretary of Energy**

Washington, DC 20585

September 28, 2000

MEMORANDUM FOR UNDER SECRETARY  
ENERGY, SCIENCE AND ENVIRONMENT

UNDER SECRETARY FOR NUCLEAR SECURITY

FROM: T. J. GLAUTHIER

A handwritten signature in black ink that reads "T. J. Glauthier". The signature is written in a cursive style and is positioned to the right of the printed name.

SUBJECT: Realizing the Benefits of Integrated Safety Management

This month marks a significant milestone in our effort to implement Integrated Safety Management (ISM). Nearly every site has successfully completed the initial implementation phase, and the few remaining sites are on the road to this goal. I sincerely appreciate the efforts of field office managers over these past few years. Fully integrating safety management into the complex diversity of our operations is an evolving process. ISM is a continuing journey, not a destination. We should be proud of what we have accomplished to date. We should remain eager to continue improving performance. The safety of our missions will be enhanced from the knowledge gained through the feedback and improvement elements of self-assessments, lessons learned, and corrective actions which are fundamental to ISM.

The Department's leadership is unified in its belief that ISM provides a central, enduring framework. Protection of the public, workers, and the environment depends on the continuity of our ISM systems. The return on our investment in ISM over the next few years will be best assured by ongoing management attention to efforts such as those described in the attachment. These efforts will help sustain our ISM systems and improve performance, and will also bring other key DOE processes in line with the ISM philosophy.

I would appreciate your insights and recommendations for maintaining effective ISM systems. This topic will be on the agenda for the upcoming Field Management Council and Field Managers' Meetings.

Attachment

cc: Heads of Departmental Elements

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## Sustaining ISM Systems and Improving Performance

**Ongoing effort is needed to assure that ISM systems continuously improve and are effective at all levels of work. Managers need to:**

- **Sustain and Improve ISM Systems.**
  - (1) Conduct Effective Line Oversight and Contract Management - Effective line management oversight is key to ensuring continuous improvement of ISM systems. Effective line oversight begins with self-assessments by contractors and effective oversight by DOE field and program offices. Contractors are expected to review their own performance, while DOE field and program offices review and manage their contractors. The DOE Line Environment, Safety and Health Oversight Policy (DOE P 450.5) and Chapter IV of the Integrated Safety Management System (ISMS) Guide (DOE G 450.4-1A) provide additional information.
  - (2) Make Annual ISM Updates Meaningful - Complete and thoughtful annual contractor updates to safety performance objectives, performance measures, and commitments in accordance with DEAR Clause 48 CFR 970.5204-2 and in consonance with annual DOE budget execution guidance and direction are essential for a strong, sustained ISM program. Chapter IV of the ISM Guide provides guidance to DOE and its contractors for (1) keeping an approved ISM system effective and (2) developing and responding to DOE's annual program and budget execution guidance and direction. Chapter IV also provides guidance in support of the above DEAR clause, which requires DOE and contractor actions to maintain the integrity of the ISM system and to generate revisions as scheduled by the contracting officer.

DOE Contracting Officers should determine annually whether their contractor's ISM systems and system requirements (i.e., ISM system descriptions, lists of applicable directives, and authorization agreements) are current, valid, and appropriately reflected in the implementation procedures and practices. Additionally, DOE field and headquarters elements need to maintain the currency and validity of their own ISM infrastructure. Keeping an ISM system current requires maintaining an effective ISM system, as addressed in Chapter IV of the ISM System Guide; making the appropriate adjustments as lessons are learned and as budgets and/or missions change; and assuring appropriate technical competency of personnel performing mission-related tasks. Continuing ISM verifications may be appropriate in limited cases, as described in Chapter IV of the Guide.

- (3) Strengthen Activity Level Work Planning and Worker Involvement – Workers have the right to fully understand the safety risks of their work, including routine tasks, work functions within the skill-of-the-craft, and the troubleshooting and repair of defective systems or equipment. ISM work planning processes include proactively seeking worker involvement in defining the work, identifying and analyzing the hazards, establishing the controls, identifying training requirements, and providing feedback for improvement. All these elements need to be consistently applied and emphasized as an essential element for the long-term success of ISM. Department managers need to identify and share good practices and lessons learned on worker involvement and on systems and measures for protecting our workers.
  - (4) Continue Independent Oversight of ISM Implementation - To provide senior line management with an independent assessment of ISM implementation effectiveness, the DOE Office of Independent Oversight (EH-2) will continue to perform periodic Safety Management Evaluations, programmatic and project reviews, and, when necessary, accident investigations. These will determine whether the safety performance of contractors and DOE field and program offices is demonstrating that ISM systems are effective. The evaluations are to serve as a basis of dialogue between the reviewer and the reviewed. Corrective actions will be established by the responsible line managers and independently validated by EH-2. These actions will be tracked and managed in the Department's Corrective Action Tracking System, as well as in field tracking systems. Substantive disagreements are to be referred to the Department's Chief Operating Officer as outlined in DOE Order 414.1A, *Quality Assurance*. Sharing of lessons learned from the EH-2 efforts is another key component of continuous improvement that will also serve, where appropriate, as input to the ISM annual update activity.
- **Integrate key DOE Processes with ISM.** Integration of key DOE processes into a consistent, unified management system is necessary for the Department's future success. Line managers need to:
    - (1) Apply ISM throughout the Facility Life Cycle - Effective project management ensures that safety is integrated throughout the life-cycle including in design and construction, operation, modification, and deactivation and decommissioning. ISM is an integral part of managing the entire facility or activity life cycle. We are in the process of upgrading our project management capability. The DOE Office of Engineering and Construction Management is leading revisions of the associated DOE directives to strengthen project management in an integral way with ISM principles.

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Attachment A

- (2) Strengthen Application of ISM in the Budget Process - ISM begins with the work scope definition function, which is initiated by the annual DOE mission and budget direction and guidance provided to contractors. Program and field offices should assure that those processes for establishing annual mission and budget direction and guidance ensure that ISM principles are fully applied, with particular emphasis on the effective use of feedback information to improve future operations.
  
- (3) Improve Use of Feedback and Improvement Mechanisms - The Department has an abundance of feedback mechanisms that can be used to improve operations throughout the DOE complex. Our challenge is to increase overall effectiveness of identifying, analyzing, prioritizing, integrating, and completing needed corrective and improvement actions. Line managers need to get personally involved in reviewing and making use of available performance feedback information to drive continuous improvement.