

Defense Nuclear Facilities Safety Board



DNFSB Staff Comments on ISM Status

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Topics

- ISM Status Overview
- November 9, 2001 Board Letter - ISM Annual Reviews
- March 29, 2002 Board Letter - Directives Reduction



ISM Status

- Recommendation 95-2
 - ISM in 3rd Phase of Implementation
 - Annual Updates
 - Recommendation Closure
- Success
 - Phases 1 and 2 complete
 - DOE Senior Mgmt Commitment
 - Worker Support and Involvement



ISM Weaknesses

- Uneven implementation throughout DOE
- Risk of becoming unwieldy – keep focus on doing work safely
- Feedback and Improvement
- DOE Tech Competence
- Annual Reviews
- Requirements Reductions



November 8, 2001 Letter on Annual ISM Reviews

- Commended DOE for ISM implementation, verifications and Authorization Agreements.
- However, improvement efforts appear to have faltered.
- Annual reviews intended to ensure ISM Description is current and identify deficiencies for correction.
- Chapter IV ISM Guide provides good guidance.
- Annual process to be integral with DOE's contract management system and the relevant DEAR clauses.
- Should use continuous assessment programs (DOE and Contractor) as input to evaluation.
- If assessment programs not fully implemented or functioning – may need more extensive evaluation like initial verifications – considered interim step only.



March 29, 2002 Letter on Directives

- Provided in response to recent initiatives to reduce “burdensome requirements.”
- Historical perspective of previous DOE directives system and how it has evolved.
 - Old Order system
 - ISM – 1995 transition to 3 digit orders
 - Small set of high-level safety expectations – one generally applicable to most work-remained in orders and manuals
 - Shifted other safety requirements to guides and standards
 - Use WSS or S/RID to develop appropriate set (List B)
 - Relied heavily on technical abilities of DOE personnel and contactors to determine appropriate set.
 - Senior DOE leaders recently concluded that not as successful at reducing burdens and excess cost.
- General comments on initiatives.
- Comments on “Hopf” review team recommendations.



General Caution

- Cautions against “actions that would cause DOE’s safety assurance program to be diminished or lead the public to perceive a decreased emphasis on safety in DOE Operations”



Orders Complement 10 CFR 830

- Major change in safety regulation scheme 5 years ago.
- DOE's Directives system implies that many or most of the safety expectations in Orders and Manuals should be in contracts.
- These complement Nuclear Safety Management Rule.
 - *DOE Orders for other nuclear safety management topics such as maintenance, training, conduct of operations, defect identification, and occurrence reporting, will be retained so that the applicable and appropriate requirements of the orders can continue to be referenced in contracts. (Federal Register notice for the Interim Final Rule – Part 830, 2000)*



Contract List B

- More responsibility for contract development and administration with the field managers.
- Current DOE staffing at many field offices doesn't have internal expertise in some areas necessary to negotiate a "necessary and sufficient" requirements set.
- Previous experience indicates augmentation required to evaluate List "B".



Federal Employee Requirements

- Federal employees bound by requirements in directives system.
- If Order requires inefficient processes or is overly prescriptive for Feds – may impose indirect burdens and costs on DOE contractors.
- May be benefit to reviewing Federal requirements in Orders instead of contractor requirements.



Performance-Based

- DOE is emphasizing “performance-based” requirements.
- Board encourages requirements that clearly define mission expectations in the form of end products or results to be delivered.
- However, “DOE is cautioned to move slowly in replacing well-established safety practices developed by the national and international nuclear safety community with general, performance-based safety objectives in the name of eliminating ‘needlessly burdensome’ requirements.”



“Hopf” Review

- Generally agreed with teams recommendations on Orders of Interest to the Board – only minor changes or clarifications recommended by the teams.
- Comments
 - Federal employee requirements
 - May want to add some requirements.
 - What about Guides, Manuals, Handbooks and Standards? Look for commercial equivalents.