



Department of Energy

Washington, DC 20585

June 25, 2003

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW
Suite 700
Washington, D.C. 20004-2091


Dear Mr. Chairman:

The purpose of this memorandum is to report to you on the completion of commitment 3.7 of the Department's Quality Assurance Improvement Plan (QAIP). This commitment, *Ensure that DOE and Contractor Annual Updates to ISMS and QA Program Descriptions are Integrated and Occur*, required an in-depth review of the history and processes used to validate ISMS implementation declarations in Environmental Management. This was accomplished by obtaining data provided by field elements and their contractors, reviewing the effectiveness of existing programs by evaluating operational and safety performance, directing appropriate corrective actions, and providing feedback and clarifications when required.

The enclosed report provides additional information for your use. I have approved of the approaches presently employed while recognizing the need to encourage and promote improvements to the QA and ISMS program performance in Environmental Management.

If you have any questions, please call me at (202) 586-7709, or Mr. Paul Golan, Chief Operating Officer, at (202) 586-0738.

Sincerely,


Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure

cc: Mark Whitaker, DR-1



QAIP 3.7

Commitment - Ensure that DOE and Contractor Annual Updates to ISMS and QA Program Descriptions are Integrated and Occur.

Deliverable - EM Approved Schedules for Annual Revisions or Basis for Revision Exemptions.

As a result of the Assistant Secretary for Environmental Management (EM) memo of December 19, 2002, *Submittal of Annual Integrated Safety Management System (ISMS) Declarations*, EM Field Managers reported status on a number of requested ISMS activities at their sites. [Note: This memo was officially transmitted to the Board on January 14, 2003.]. The Field Managers reports included:

- A declaration of ISMS implementation for CY 2002.
- Acknowledgement of the direction for subsequent declarations by September 30 of each FY thereafter.
- Schedules for annual review, revision and re-verification (DOE & Contractor) for changes to ISMS and QAPD - or justification bases for exemption to this process.
- Historical details of ISMS maintenance since initial declarations.
- Dates for all ISMS revisions/re-verifications completed (DOE & Contractor)
- Bases for determination for omission of re-verifications, where applicable.
- Submittal of CAPS for declarations of non-implementation of ISMS.
- Descriptions of Compensatory measures employed in the "No Implementation" case.

Responses were received for appropriate EM Sites (CAO, ID, OH, OR, ORP, RF, RL, & SR) by the required response date (1/31/03). The responses were shared with the Board staff in June 2003. The reports show 4 sites declared ISM fully implemented (CAO, ID, OH, & SR), 2 sites with re-verifications in process (OR & ORP), and 2 sites not fully implemented with CAPS in place and working (RF & RL). Subsequently, OR and ORP have declared satisfactory implementation once corrective actions are successfully completed. Compensatory measures are in effect at RF and RL while needed improvements are being finalized. The compensatory measures include actions described in approved Corrective Action Plans that are being worked on a continuing basis. Final verification of effectiveness for both sites is scheduled for completion prior to the end of this fiscal year.

An analysis of the declarations and related information resulted in the EM-3 memorandum to the Field on April 7, 2003, *Integrated Safety Management Program Declarations*, in which expectations were clarified so that all sites could integrate their QA and ISMS program directly to 'Improve Safety Performance'. [This memorandum was shared with the Board staff in May and the responses were sent to the Board staff in June]. Responses to this memorandum were also used to evaluate performance trends. Feedback to the sites was provided in a general memorandum of May 23, 2003 and in face-to-face conferences with field managers. The May 23, 2003 feedback memo was also provided to the Board staff in June.

Also, the EM-1 memorandum of May 23, 2003, *Environmental Management Project Oversight and Assessment Policy*, addressed to the Field Managers and EM staff, added clarification and direction for improvement to existing programs in addition to completing the QAIP commitment 1.3.2 on setting Policy and Expectations for EM oversight.

Since the start of the processes for Quality Improvement at the beginning of FY 2003, EM has been ensuring programs are maintained as required by initiating the following activities:

1. Directing EM-3 to be responsible for Line Operational Oversight, including ES&H performance as well as operational performance.
2. Holding Field Managers accountable for the performance of their contractors as well as formal delegations of specific responsibilities to Field Managers.
3. Requiring immediate notification of events and incidents in accordance with specific criteria to keep management apprised of potential problems and trends.
4. Evaluating field/contractor performance in operations and safety on a weekly, monthly, and quarterly basis. Specific corrective actions are then directed based on early detection and trend verification.
5. Assigning headquarters staff personnel as members of assessment and verification teams, especially to verifications of DOE performance.
6. Assigning senior headquarters managers and staff to investigate/resolve problems identified and to follow up on solutions as the need arises.

As a result of these activities, EM is assured that ISMS and QA Program activities are integrated and are progressing satisfactorily. This assurance is provided because objective evidence of an effectively implemented QAPD is a requisite for acceptance of ISMS implementation. Qualified specialists have been assigned to verification and review teams to determine the effective implementation of QA before approval for ISMS implementation is granted. The responsibility for approval of annual reviews is assigned by the DEAR clause to the COTR. Field Office contractors are held to the Annual Review requirement and no exemptions from the process have been requested or granted. Schedules have been verified to be consistent with contract requirements and sites are taking the necessary actions required to make declarations consistent with annual budget submittals.

The QAPDs are reviewed on an annual basis but are revised on a 'for cause' basis at any time corrective action is required, or annually when improvements are planned. As stated above, demonstrated effectiveness of their implementation is a requisite for approved ISMS implementation.