

U.S. Department of Energy

Oak Ridge Operations

ORO O 250
Chapter I

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SUBJECT: OAK RIDGE OPERATIONS STANDARDS MANAGEMENT PROGRAM OVERVIEW

1. PURPOSE. This Chapter provides an overview of the Oak Ridge Operations (ORO) Standards Management Program. It assigns responsibilities and accountability and provides administrative and/or contractual guidance to ORO and its contractors. Nothing in this issuance changes any requirements contained in any DOE Order.
2. CANCELLATION. This Chapter cancels and replaces the following parts of ORIG 1300.X1A, OAK RIDGE OPERATIONS STANDARDS MANAGEMENT PROGRAM, dated July 26, 1995: the base ORIG, Attachment A, and Chapters 1 and 2 of Attachment B.
3. APPLICABILITY. The provisions of this Chapter apply to ORO organizations. This Chapter provides an overview of the standards management program and does not contain any contractor requirements.
4. RESPONSIBILITIES. Refer to the remaining Chapters of this ORO Order for specific responsibilities related to subjects covered in those Chapters. The following responsibilities apply to all Chapters.
 - a. Principal Staff.
 - (1) Identify employees in their organizations to serve as subject matter experts or operational experts for assigned Orders, Chapters, Rules, standards, and functional areas.
 - (2) Ensure that standards management activities are completed in a timely and high quality manner.
 - (3) With others involved in the standards management program discuss and resolve any technical disagreements that arise during program activities, such as preparation or verification of assessments and Implementation/Corrective Action Plans (ICAP).
 - (4) Ensure the collection and maintenance of information on the qualifications and experience of personnel involved in standards management program activities, and provide copies to the Directives Management Group (DMG) for all personnel involved in environment, safety, and health (ES&H) standards activities.
 - b. Contracting Officers' Representatives (COR), in addition to the responsibilities described in subparagraph 4a above, identify Standards Coordinators to serve as primary points of contact on standards management program activities within each primary organization/program area.

- c. Leader, Directives Management Group, provides support to all ORO organizations on the standards management program:
 - (1) Chairs a joint ORO-contractor working group that identifies and works issues, develops coordinated approaches, shares lessons learned, tracks status of projects, and oversees the implementation and institutionalization of the standards management program.
 - (2) Develops administrative guidance and implementing procedures for standards management program activities and coordinates schedules with COR and Directors of Divisions of Primary Interest (DPI).
 - (3) Provides briefings, indoctrinations, advice, and assistance to subject matter and operational experts, Standards Coordinators, and management on standards management program activities and processes.
 - (4) Serves as the primary coordinator for all standards management activities, including administrative duties regarding implementation planning for the Price-Anderson Amendments Act (PAAA). Coordinates among project participants, including DPI, COR, Standards Coordinators, contractors, and Headquarters personnel.
 - (5) Prepares all standards-related documents for which ORO has not been delegated approval authority for submission to Headquarters for approval.
 - (6) Maintains records of projects, plans, and other documents related to ORO's standards management program.

5. REQUIREMENTS AND PROCEDURES.

- a. Introduction. ORO is responsible for oversight of programs and facilities directed by the offices of Defense Programs (DP), Environmental Management (EM), Nuclear Energy (NE), and Energy Research (ER). Lockheed Martin Energy Research (LMER) operates the Oak Ridge National Laboratory for ORO. Lockheed Martin Energy Systems (LMES) operates the Y-12 Plant, the K-25 Site, and limited activities at the Portsmouth and Paducah Gaseous Diffusion Plants.

ORO, LMES, and LMER have developed a comprehensive standards management program that addresses the Department's criteria for this type of program, key Defense Nuclear Facility Safety Board (DNFSB) issues, and internal ORO management and oversight needs. Other contractors have certain standards management responsibilities as described in the Applicability paragraph of each Chapter of this Order.

The primary driving factor behind the standards management program is the need to ensure the identification and implementation by DOE and contractors of applicable ES&H standards that are necessary and sufficient to provide adequate protection of workers, the public, and the environment. Other drivers include PAAA, contractual clauses related to safety management

and directives, various DNFSB recommendations related to standards, and the *Criteria for the Department's Standards Program* issued August 1994.

The approach developed and presented in this Order integrates program requirements from all DOE program offices and existing ORO and contractor standards management programs.

- b. Overview of the ORO Standards Management Program. The process described below provides an overview of the steps ORO and contractors follow to identify and implement ES&H and related standards.
- (1) Standards Development. ORO and its management and operating (M&O) contractors may comment on proposed directives and standards under development by DOE, including DOE Rules published for comment in the Federal Register. The comment process allows both sides to express concerns and obtain clarification before the documents are finalized. For further information, refer to Chapter II, OAK RIDGE DIRECTIVES SYSTEM, and Chapter III, OAK RIDGE OPERATIONS TECHNICAL STANDARDS PROGRAM. ORO and contractors are also encouraged to comment or otherwise participate in the development of other standards through appropriate channels.
 - (2) Identification of Source Documents.
 - (a) DOE Directives.
 - 1 Receipt and Distribution of Directives. Headquarters sends new and revised directives to the DMG. The DMG routes each DOE Policy Statement, Notice, Order, or Manual to the DPI to determine if it appears to be applicable to work performed by ORO and any or all ORO contractors. The DMG then routes applicable directives to the M&O contractors and ORO organizations.
 - 2 Impact Assessment/Contract Appendix. M&O contracts contain directives clauses that provide for development and maintenance of a contract appendix listing certain applicable directives. Before a new or revised DOE directive is included in such an appendix, the contractor makes an initial determination of whether the document is applicable under contract terms. If the answer is yes, the contractor determines whether it is currently in compliance with the directive and what the overall impact on operations might be. This information is transmitted to ORO within 30 days of receiving the new or revised directive.

Chapter IV of this Order contains further information on the contract appendix process.
 - (b) Other Source Documents. The DMG also receives and distributes copies of DOE implementation guides. Contractors directly receive copies of DOE technical standards and are responsible for obtaining new and revised Federal, state, and local laws and regulations, including DOE Rules, from the appropriate sources.

- (3) Work Smart Standards (WSS) Documents. Contractors may either choose to comply with the requirements in applicable DOE ES&H directives or develop WSS documents that contain necessary and sufficient ES&H requirements adequate to protect the environment and the health and safety of workers and the public. Chapter V of this Order contains further information on development and maintenance of WSS documents.
- (4) Implementation/Corrective Action Planning. Oak Ridge Associated Universities, LMES, and LMER write implementation plans for new/revised DOE directives added to the contract appendix where the contractor cannot achieve full compliance within six months and within existing funds. LMES and LMER also write implementation plans for new/revised requirements added to the WSS documents when they cannot achieve full compliance within existing funds and within six months from the time the requirement is accepted for inclusion in the WSS document.

Noncompliances identified through assessments must be corrected, tracked, and trended. When LMES or LMER finds a significant noncompliance associated with a WSS requirement, it develops a corrective action plan that details the actions and schedule needed to come into compliance. ORO and contractors use data from assessments and corrective action plans for tracking, trending, and planning future assessments.

Because both implementation and corrective action plans require similar information, a streamlined dual-purpose document called an Implementation/Corrective Action Plan (ICAP) has been developed for use. It incorporates the elements of the previous implementation plans and Requests for [DOE] Approval and replaces these documents for the purposes specified above.

In addition, implementation plans are required from contractors for most DOE nuclear safety Rules; some directives also require ORO to prepare implementation plans. Typically, such documents are prepared in accordance with guidelines issued with the Rule or directive.

Chapter VI of this Order contains further information on the preparation, review, and approval of all types of implementation and corrective action plans.

- (5) Requirements Flowdown. After requirements are accepted as appropriate and applicable, they must be incorporated in implementing documents (such as policies, programs, procedures, and other command media) that guide and control actual work processes.
- (6) ES&H Oversight and Self-Assessment. Contractors perform self-assessments to determine ongoing compliance with requirements. ORO performs oversight assessments of the contractor's performance. The Quality and Facility Safety Division provides independent assessment of the compliance process within both ORO and contractor organizations. Headquarters and other organizations perform oversight of ORO's performance. For information on the ORO ES&H assessment program, refer to ORO O 220, Chapter VIII, ENVIRONMENT, SAFETY, HEALTH, AND QUALITY ASSESSMENT PROGRAM.

6. REFERENCES. See each individual Chapter for references that apply only to that particular subject matter. General references include:
 - a. DOE/EH/0416, CRITERIA FOR THE DEPARTMENT'S STANDARDS PROGRAM, dated August 1994.
 - b. DNFSB RECOMMENDATIONS 90-2, 94-5, and 95-2, and associated DOE Implementation Plans responding to those Recommendations.
7. DEFINITIONS. See Attachment 1 of this Chapter for a glossary of terms used in the standards management program.
8. CONTRACTOR REQUIREMENTS DOCUMENT. This Chapter contains no contractor requirements. See the individual Chapters of this Order for Contractor Requirements Documents specific to that Chapter.
9. ATTACHMENTS.

Attachment 1 - Definitions.

DEFINITIONS

These definitions apply specifically to the ORO standards management program and may not be identical to the definitions for the same terms used in other documents.

1. ADEQUACY. Adequacy is achieved when a set of ES&H and related standards/requirements for specific sites, facilities, or activities has been approved by DOE as providing an acceptable level of protection equivalent to comparable commercial facilities/activities. If there are no comparable commercial facilities, adequacy is what is determined to be acceptable through the WSS document development process.
2. APPLICABILITY REVIEW. The review of whether a standard or requirement addresses the work performed at a site or facility or by a contractor. The applicability decision does not include cost/benefit analysis or a judgment of the reasonableness of implementing the standard or requirement.
3. ASSESSOR. A person with subject matter knowledge related to a particular functional area or requirements document who is assigned to determine the status of compliance with requirements related to that functional area or document.
4. ASSUMPTION. A statement within a WSS that documents how a requirement is applied for the specific site or facility or by a contractor. An assumption may define applicability, clarify the intent of the requirement, provide cross-references, or define basic assumptions used in applying the requirement.
5. COMPENSATORY MEASURES. Necessary interim actions taken to reduce the risk to the health and safety of the public, workers, or the environment to an acceptable level (i.e., the likelihood of killing, maiming, injuring, or exposing the public or workers to hazardous materials is very small over the remaining life of the facility) until actions can be taken to mitigate or eliminate the noncompliance and/or risk (i.e., provide a level of protection equal to that provided by the requirement or come into full compliance with the requirement).
6. CORRECTIVE ACTIONS. Actions that, when implemented, will result in compliance with a particular requirement.
7. ELEMENTS. The major topics of the functional areas contained in the WSS documents.
8. EXEMPTION. An exemption is a formally requested and approved relief, waiver, or release (either temporary or permanent) from an applicable requirement.
9. FUNCTIONAL AREA. A major program area that is applicable to DOE operations. ES&H functional areas include Fire Protection, Radiation Protection, etc.

10. IMPLEMENTATION/CORRECTIVE ACTION PLANS (ICAP). An ICAP specifies actions and schedules for achieving compliance with contractual requirements and provides appropriate information to support the proposed actions.
11. IMPLEMENTING DOCUMENTS. Implementing documents include, but are not limited to, policies, procedures, engineering drawings, training materials, job postings, education/qualification documents, permits, and Safety Analysis Reports that specify the actions and conditions necessary to operate in accordance with applicable requirements.
12. NATIONAL CONSENSUS STANDARDS. A prescribed set of rules, conditions, or best management practices published by a national organization (e.g., American Society of Mechanical Engineers).
13. OPERATIONAL EXPERT. Personnel knowledgeable of site/facility activities, processes, programs, policies, and procedures (e.g., Facility Representative, Facility Manager, etc.).
14. PROGRAMMATIC ASSESSMENT. The review of implementing documents (such as policies, programs, procedures, and other command media) to determine if they properly flow down applicable requirements.
15. PROGRAMMATIC COMPLIANCE. Programmatic compliance may be "Full," "Planned," or "Noncompliance." If the implementing documents are sufficient to describe the actions and conditions necessary for compliance, the compliance status is "Full." If actions needed to come into compliance have been included in an implementation plan or ICAP that has been formally approved or transmitted to DOE for approval, the compliance status is "Planned."
16. REQUIREMENT. A specific sentence, paragraph, or section within a source document that prescribes explicit actions, responsibilities, or criteria that must be met because of either legal or contractual obligations. References included in a reference section are not considered to be requirements, nor are broad and general policy statements.
17. REVIEW COMPONENT. A site, program, or process within ORO (such as DP, EM, K-25 Site Office, etc.) that is considered as a unit for the purpose of assessing source documents.
18. SOURCE DOCUMENT. The document in which a requirement originates, such as DOE Orders or Rules, laws, and regulations. An organization's internal policies and procedures are implementing documents, not source documents.
19. STANDARD. Standards are the expressed expectations for performance of work. Standards may be reference points against which to measure excellence or may become enforceable requirements (either under law or under Department contract). Standards include Federal, state, and local laws and regulations; Department Orders; nationally and internationally recognized standards; and other documents (such as industrial standards) that protect the environment and the safety and health of workers and the public.

20. STANDARDS AND REQUIREMENTS INFORMATION DATABASE (STRIDe). STRIDe is a database used by ORO that includes a list of requirements and status information relating to their implementation. It contains the requirements applicable to each functional area; information on the implementing documents (e.g., policies, standards, and procedures); assessment data; and compliance status.
21. SUBELEMENTS. The subtopics or subjects included under each element of the functional areas described in WSS documents.
22. SUBJECT MATTER EXPERT. An individual with experience and education or training in a particular functional area, sufficient to serve as a technical advisor on matters relating to that functional area. Subject matter experts may serve as assessors, prepare and/or review corrective action plans and implementation plans, and develop or review WSS documents.
23. TAILORED APPROACH. A method of implementing a requirement to the extent appropriate and necessary based upon the specific mission, activities, and hazards at a site or facility.
24. VALIDATION. Validation is a confirmation of documented information relating to standards/requirements implementation assessment data, results, and closure statements. Validation consists of reviewing records or independently observing actions and conditions to a degree and in a manner that is consistent with the nature and significance of the information and the level of confidence needed.
25. VERIFICATION. The act of looking at a particular document or action to determine its accuracy (i.e., agreement with the assessment result). Verification may be part of the validation process, which looks at the overall adequacy of standards management programs. Field verification of adherence-based compliance is usually performed on a sample basis in which requirements are selected using the reviewer's experience and the criteria provided in ORO O 220, Chapter VIII, ENVIRONMENT, SAFETY, HEALTH, AND QUALITY ASSESSMENT PROGRAM.
26. WORK SMART STANDARDS (WSS). WSS documents are the necessary and sufficient set of requirements to meet performance expectations and objectives for providing adequate protection to workers, the public, and the environment. The process of developing the WSS document includes (a) defining the work and hazards, (b) creating the teams, (c) defining the protocols and documentation requirements, (d) identifying the set of requirements, (e) confirming the WSS set, if necessary, and (f) approving the set.