

U.S. Department of Energy

Oak Ridge Operations

ORO O 250 Rev. 2 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 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 ORO O 250, Chapter I, dated August 13, 1996.
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 review of program plans, implementation plans, and corrective action plans.
 - (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 Officer's Representative (COR), in addition to the responsibilities described in subparagraph 4a above, identifies 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 the Standards Management Working Group (SMWG), which is 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 as needed with each COR and Director of a Division 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 DOE Rules published under the Price-Anderson Amendments Act (PAAA). Coordinates among project participants, including the DPI, COR(s), 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.

- d. Standards Coordinators.
 - (1) Serve as the point of contact for distribution of standards information and new directives.
 - (2) Solicit comments on draft directives from their organization, compile comments received to reflect their organization's position, and review contractor comments for endorsement or disagreement.
 - (3) Coordinate standards activities and projects for their program area, including review of implementation plans, proposed changes to contractual requirements, assessment data as required, etc.

5. REQUIREMENTS AND PROCEDURES.

- a. Introduction. ORO is responsible for oversight of programs and facilities directed by Headquarters program offices, such as the offices of Defense Programs, Environmental Management, Nuclear Energy, and Energy Research. Some of ORO's prime contractors are:

- Lockheed Martin Energy Research Corporation (LMER), which is the management and operating (M&O) contractor that operates the Oak Ridge National Laboratory (ORNL).
- Lockheed Martin Energy Systems (LMES), which is the M&O contractor that operates the Y-12 Plant.
- Bechtel Jacobs Company, which is the management and integrating (M&I) contractor that operates the East Tennessee Technology Park, performs activities at the Portsmouth and Paducah Gaseous Diffusion Plants, and performs waste management activities at ORNL and the Y-12 Plant.
- Oak Ridge Associated Universities (ORAU), which is an M&O contractor.

ORO and its prime contractors have developed a comprehensive standards management program that addresses the Department's criteria for this type of program (i.e., *Criteria for the Department's Standards Program* dated August 1994), key Defense Nuclear Facilities Safety Board (DNFSB) issues, DOE Rules, and internal ORO management and oversight needs. In addition, this program fulfills certain core functions of integrated safety management as expressed in DOE P 450.4, SAFETY MANAGEMENT SYSTEM POLICY.

DOE's expectations are expressed through directives. ORO and its contractors have an opportunity to review and comment on proposed directives to ensure that they are appropriate to control the work and associated hazards and to provide adequate protection of workers, the public, and the environment. ORO and its contractors also have available two DOE-approved tools to identify appropriate ES&H standards/requirements--the Work Smart Standards (WSS) process and the Standards/Requirements Identification Document (S/RID) change process. Approved standards/requirements sets are placed in the contract. Contractors also have certain standards management responsibilities as described in the Applicability paragraph of each Chapter of ORO O 250. 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 DOE directives.
- (1) Standards Development. ORO and its management and operating (M&O) contractors and M&I contractor are afforded the opportunity to 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

ORO O 250, Chapter II, OAK RIDGE DIRECTIVES SYSTEM, and Chapter III, OAK RIDGE OPERATIONS TECHNICAL STANDARDS PROGRAM. ORO and its contractors are also encouraged to comment or otherwise participate in the development of other standards through appropriate channels.

(2) Identification of Contract Requirements.

(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 establish ORO's position on applicability of the documents to particular contracts. The DMG then routes directives applicable to the contract directives appendix to the M&O/M&I contractors and ORO organizations.
- 2 Impact Assessment/Contract Appendix. M&O/M&I 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 (or portion thereof) is included in such an appendix, the contractor makes a 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. The DMG provides electronic notification of draft and final DOE Rules that are published in the Federal Register. Contractors directly receive copies of DOE technical standards and are responsible for obtaining new and revised Federal, state, and local laws and regulations from the appropriate sources.
- (3) WSS Sets. Contractors may either choose to comply with the requirements in applicable DOE ES&H directives or develop WSS sets that are appropriate to control the work and associated hazards and to provide adequate protection of workers, the public, and the environment. Chapter V of this Order contains further information on development, approval, and maintenance of WSS sets.
 - (4) S/RIDs. LMES has an approved S/RID that contains the ES&H requirements (primarily selected from DOE directives) that are adequate to protect the environment and the

health and safety of the workers and the public. In addition, ORO's M&O/M&I contractors with S/RIDs or WSS sets must follow the approved S/RIDs functional area requirements for emergency management and occurrence reporting or they must include these directives on the contract directives appendix. Although certain S/RIDs remain in use, it is expected that new contractors will use the WSS process to identify the WSS set that will contain the standards/ requirements that are appropriate to the work and associated hazards. Chapter VII of this Order contains information on maintenance of S/RIDs.

- (5) Implementation Plans and Corrective Action Plans. Implementation plans and corrective action plans have identical content requirements. The review and approval processes differ, and a corrective action plan is generally shorter and covers fewer requirements than an implementation plan.
- (a) Implementation Plans. As provided by their contract, ORO prime contractors write implementation plans for new/revised requirements added to the contract appendix, WSS set, or S/RID where the contractor cannot achieve full compliance within six months (180 days) and/or within existing funds. Some directives also require ORO to prepare implementation plans. Typically, such documents are prepared in accordance with guidelines issued with the directive.
- (b) Corrective Action Plans. The corrective action plan details the actions, schedule, and as required, any additional funds needed to correct noncompliances identified with established contract requirements during an assessment. As provided by their contract, ORO prime contractors write corrective action plans when the contractor cannot correct a noncompliance identified during an assessment within six months (180 days) and/or within existing funds. Examples of contractors with this requirement are LMES, LMER, and ORAU.

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

- (6) Rule Program Documents. DOE-approved program documents are required from contractors for most DOE Rules and the program requirements that must be met are identified in the individual Rule. When new Rules are issued, they usually permit contractors to develop implementation plans (in addition to the program document) to explain how they will come into compliance with the particular Rule requirements.

Chapter VI of this Order contains further information on the preparation, review, and approval of Rule program documents and Rule implementation plans.

- (7) Requirements Flowdown. After standards/requirements are accepted as appropriate and applicable and placed in the contract, they must be incorporated in the contractor's

implementing documents (such as policies, programs, procedures, and other media) that guide and control actual work processes.

- (8) ES&H Oversight and Self-Assessment. Contractors perform self-assessments to determine ongoing compliance with standards/requirements. ES&H noncompliances identified through assessments must be tracked, corrected, and trended. ORO and contractors use data from assessments and corrective action plans for tracking, trending, and planning future assessments.

ORO performs oversight assessments of the contractor's performance. The ORO Office of Assistant Manager for Environment, Safety, and Quality 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.

- (9) SMWG. The SMWG was established in 1993 as a DOE/contractor forum to improve communication related to standards management and certain DNFSB Recommendations, provide feedback within DOE on emerging standards issues and Headquarters initiatives, and foster a consistent approach to standards management within the Oak Ridge complex. The SMWG has representation from ORO line and site organizations and from various contractor business units. Membership is flexible and changes over time to accommodate emerging issues. From time to time the SMWG tracks the status of standards projects, WSS set development projects. It reviews and provides input on documents (e.g., ORO O 250). It moves from an information sharing group to a process development group as needed. Monthly meetings are held in conjunction with a PAAA information sharing meeting, where attendees share information on draft Rules, Enforcement, and lessons learned.
- (10) Contractor Requirements on the Internet. The DMG home page contains links to S/RIDs and WSS sets posted on contractors' home pages. The DMG home page address is http://www.ornl.gov/doe_oro_dmg/index.htm.

6. REFERENCES. See each individual Chapter for references that apply only to that particular subject matter. General references include:
 - a. DOE P 450.4, SAFETY MANAGEMENT SYSTEM POLICY, dated October 15, 1996.
 - b. DOE/EH/0416, *Criteria for the Departments Standards Program*, dated August 1994.
 - c. 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 ORO standards management program.
8. CONTRACTOR REQUIREMENTS DOCUMENT. None.
9. ATTACHMENT.

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 ORO documents.

1. ADEQUACY. Adequacy is achieved when a set of ES&H and related standards/requirements selected to control the work and associated hazards 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 set development process and the change processes for WSS sets and S/RIDs.
2. APPLICABILITY. 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. ASSUMPTION. A statement within a WSS set or S/RID that documents how a standard or 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. DOE approves implementation assumptions during the adequacy review and approval process.
4. 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).
5. CORRECTIVE ACTION PLANS. Specify actions and schedules to correct noncompliances with existing contract requirements (i.e., contract appendix, WSS, or S/RID) discovered during an assessment and provide appropriate information to support the proposed actions. Corrective action plans are required when the contractor cannot achieve compliance within six months and/or within existing funds.
6. CORRECTIVE ACTIONS. Actions that, when implemented, will result in compliance with a particular standard or requirement.
7. DAYS. Unless otherwise specified in the text, “days” refers to calendar days.
8. EXEMPTION. An exemption is a formally requested and approved relief, waiver, or release (either temporary or permanent) from an applicable law, Rule, or DOE directive 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 PLANS. Specify actions and schedules for achieving compliance with new/revised contract requirements and provide appropriate information to support the proposed actions. Implementation plans cover new and revised requirements which the contractor is unable to implement within six months and/or existing funds.
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. OPERATIONAL EXPERT. Personnel knowledgeable of site/facility activities, processes, programs, policies, and procedures (e.g., Facility Representative, Facility Manager, etc.).
13. PRINCIPAL STAFF. Includes the Manager; Deputy Manager; Special Assistant to the Manager; Director, Public Affairs Office; Diversity Programs and Employee Concerns Manager; Office of Partnerships and Program Development; Assets Manager; Office of Reindustrialization; Chief Counsel; all Assistant Managers and Deputy Assistant Managers; all Division Directors; all Site Managers, and all Group Leaders.
14. 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. Contractual requirements do not become binding upon contractors until placed in the contract appendix, WSS set, or S/RID. However, applicable requirements from Federal, state, and local laws and regulations are binding even if they are not mentioned in the contract.
15. SOURCE DOCUMENT. The standard in which a requirement originates, such as DOE Orders or Rules, laws, regulations, or voluntary consensus standard. An organization's internal policies and procedures are implementing documents, not sources of requirements.
16. STANDARD. Standards are the expressed expectations for performance of work. Standards may be reference points against which to measure excellence or they may become enforceable requirements (either under law or under Department contract). An organization's internal policies and procedures are implementing documents, not standards. Standards are also referred to as source documents. Standards include Federal, state, and local laws and regulations; Department Orders; and voluntary consensus standards that protect the environment and the safety and health of workers and the public.
17. STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT (S/RID). An S/RID lists the necessary and sufficient set of ES&H and related requirements to be implemented by a site, facility,

activity, or contractor to achieve an adequate level of protection of worker and public health and safety and to protect the environment. S/RIDs requirements are structured by functional area.

18. **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, develop or review WSS sets, and review S/RID and WSS set change packages.
19. **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.
20. **VERIFICATION.** The act of looking at a particular document or action to determine its accuracy (i.e., agreement with the assessment result). 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.
21. **VOLUNTARY CONSENSUS STANDARDS.** A prescribed set of rules, conditions, or best management practices developed or adopted by a voluntary consensus standard body, both domestic and international (e.g., American Society of Mechanical Engineers, American Nuclear Society). Per the Office of Management and Budget Circular A-119, dated February 19, 1998, a voluntary consensus standard is one that has been adopted by a voluntary consensus standard body, and industry standards, company standards, and de facto standards are not considered to be voluntary consensus standards.
22. **WORK SMART STANDARDS (WSS).** WSS sets 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 set includes (a) defining the work and associated hazards, (b) creating the teams, (c) defining the protocols and documentation requirements, (d) identifying the set of standards/requirements, (e) confirming the WSS set, if necessary, and (f) approving the set. Approved WSS sets are placed in the contract.