



Department of Energy  
Environmental Management  
Policies and Procedures



ENVIRONMENTAL MANAGEMENT ENVIRONMENT, SAFETY AND  
HEALTH OVERSIGHT PROGRAM

EM-7.4  
Revision 0

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## **1.0 PURPOSE**

The Environmental Management (EM) Environment, Safety and Health (ES&H) Oversight Program will monitor and evaluate the effectiveness of ES&H program implementation.

The Program will:

- 1.1** Determine the status of compliance with federal, state, and other contract requirements applicable to the Department of Energy (DOE) EM and contractor programs.
- 1.2** Identify conditions that may adversely affect the environment and/or public and worker health and safety.
- 1.3** Provide real-time feedback to the EM program and its contractors to achieve timely corrective actions.
- 1.4** Document findings and observations.
- 1.5** Develop corrective actions to address root causes.
- 1.6** Track and verify closure of corrective actions in a timely manner.
- 1.7** Routinely trend the findings and observations and initiate appropriate adjustments based on this feedback.

## **2.0 SCOPE**

The EM ES&H Oversight Program applies to all DOE Oak Ridge Operations (ORO) EM and EM contractor operations. This program is intended to address the oversight requirements included in the reference documents listed in Section 3 below.

## **3.0 REFERENCES AND DEFINITIONS**

### **3.1 REFERENCES**

- 3.1.1 DOE Headquarters (HQ), Office of Environment, Safety and Health (EH), October 15, 1996, Policy DOE P 450.4, *SAFETY MANAGEMENT SYSTEM POLICY*, DOE-HQ, Washington, D.C.
- 3.1.2 HQ, Office of Defense Programs (DP), June 26, 1997, Policy DOE P 450.5, *LINE*

*ENVIRONMENT, SAFETY AND HEALTH OVERSIGHT*, DOE-HQ, Washington, D.C.

- 3.1.3 DOE-ORO, Office of Assistant Manager for Environment, Safety, Health & Emergency Management (AMESH), 1999, Order ORO O 450, Chapter IV, “ENVIRONMENT, SAFETY, AND HEALTH (ES&H) OVERSIGHT PROGRAM,” DOE-ORO, Oak Ridge, TN
- 3.1.4 ORO-AMESH, 2000, Manual ORO M 411.1-1C, *MANUAL OF SAFETY MANAGEMENT FUNCTIONS, RESPONSIBILITIES, AND AUTHORITIES, LEVEL II, FOR OAK RIDGE OPERATIONS*, DOE-ORO, Oak Ridge, TN
- 3.1.5 DOE-ORO Office of Assistant Manager for Environmental Management (AMEM), November 11, 1999, EM Procedure No. EM-4.1, Assessments, DOE-ORO, Oak Ridge, TN
- 3.1.6 DOE-ORO Office of the Manager (Manager), September 9, 1999, Memorandum from G. Leah Dever to distribution, *GUIDANCE FOR INTEGRATED SAFETY MANAGEMENT*, DOE-ORO, Oak Ridge, TN.
- 3.1.7 ORO-Manager, June 8, 2000, Memorandum from G. Leah Dever to distribution, *MANAGEMENT SAFETY AND HEALTH WALK-THROUGHS*, DOE-ORO, Oak Ridge, TN
- 3.1.8 ORO-AMEM, June 8, 2000, Memorandum from Rodney Nelson to All EM Employees, *INTEGRATED SAFETY SYSTEM MANAGEMENT (ISMS) WALK-THROUGH GUIDANCE*, DOE-ORO, Oak Ridge, TN
- 3.1.9 ORO-AMEM, August 31, 2000, Memorandum from Rodney Nelson to All Environmental Management Staff, *INTEGRATED SAFETY MANAGEMENT SYSTEMS*, DOE-ORO, Oak Ridge, TN
- 3.1.10 ORO-AMEM, February 10, 2000, EM Procedure No. EM-4.2, *FACILITY WALKTHROUGHS*, DOE-ORO, Oak Ridge, TN
- 3.1.11 HQ-EH, December 28, 1998, *STARTUP AND RESTART OF NUCLEAR FACILITIES*, DOE-HQ, Washington, D.C.

### **3.2 DEFINITIONS**

- 3.2.1 ES&H Assessments: a formal, systematic process to ensure that EM contractor

work and internal ORO EM activities are conducted in accordance with defined ES&H requirements and expectations.

- 3.2.2 Operational Awareness: any of a variety of activities, such as walk-throughs, to analyze and evaluate operations through observations, interviews, or document reviews.
- 3.2.3 Walk-through: a performance-based assessment conducted against the contractor's procedures to ensure operational awareness. Walk-throughs, as well as any follow up, should be documented.
- 3.2.4 Management Walk-throughs: a demonstration of management involvement in safety and health issues and raise safety awareness at all levels by performing walk-throughs.
- 3.2.5 Finding: a negative practice that is a deviation from a requirement.
- 3.2.6 Observation: the documenting of a deviation from expectations or good management practices
- 3.2.7 Proficiency: a positive practice above and beyond typical industry standard practices and worthy of sharing with other contractors.

## **4.0 RESPONSIBILITIES**

### **4.1 ASSISTANT MANAGER FOR ENVIRONMENTAL MANAGEMENT**

- 4.1.1 Has overall responsibility for the effectiveness of the EM ES&H Oversight Program.
- 4.1.2 Ensures that the ES&H oversight policies established by the ORO Manager are implemented.
- 4.1.3 Determines the EM facilities and activities that warrant Facility Representative coverage and provides necessary resources.
- 4.1.4 Performs management walk-throughs of EM facilities and operations.

## **4.2 CONTRACTING OFFICER'S REPRESENTATIVE**

- 4.2.1 Applies and enforces this ES&H Oversight Program in accordance with the oversight requirements included in the Section 3.1, References.
- 4.2.2 Ensures that the various components of the oversight program are carried out including the following key elements of ISMS:
  - (1) Performance measures and performance indicators.
  - (2) Line and independent evaluations.
  - (3) Compliance with applicable requirements.
  - (4) Data analysis and corrective actions.
  - (5) Performance improvement.
- 4.2.3 Ensures contractors properly allocate resources for ES&H programs.
- 4.2.4 Judges contractor performance against standards and contractually established performance measures, contractor self-assessment results, and other ES&H performance criteria as needed.
- 4.2.5 Determines the need for and authorizes For-Cause Reviews.
- 4.2.6 Ensures that an operational awareness program is established and implemented that routinely monitors contractor performance.
- 4.2.7 Ensures that periodic Authorization Basis document reviews are conducted such as those needed for Safety Analysis Reports, Technical Safety Requirements, Basis for Interim Operations, and evaluates potential Unreviewed Safety Question Determinations.
- 4.2.8 Ensures that the contractor prepares improvement plans and/or corrective action plans for DOE Headquarters (HQ) Office of Oversight (EH-2) findings.
- 4.2.9 Approves improvement or corrective action plans submitted by the contractor.
- 4.2.10 Ensures that appropriate ES&H requirements are included in contracts.
- 4.2.11 Ensures that all applicable Standards/Requirements Identification Documents and Work Smart Standards sets are kept current.

- 4.2.12 Ensures that prime contracts contain a requirement for ES&H oversight of direct subcontractors and their subcontractors, consistent with Order ORO O 450, Chapter IV.
- 4.2.13 Ensures that the contractor's ES&H self-assessment program is carefully evaluated.
- 4.2.14 Performs management walk-throughs of EM facilities and operations.

### **4.3 PROGRAM GROUP LEADERS, TEAM LEADERS, AND SITE OFFICE MANAGERS**

- 4.3.1 Direct implementation of the Oversight Program within their areas of responsibility, including development of a quarterly oversight schedule.
- 4.3.2 Maintain an operational awareness of contractor work activities, including work of sub-contractors, through program reviews, site visits, and through consultation with assigned Facility Representatives and ES&H subject matter experts.
- 4.3.3 Review and monitor contractor's performance in accordance with the approved Work Smart Standards set for the particular contractor.
- 4.3.4 Assist the Contracting Officer's Representative (COR) in ensuring the EM workplace is safe and protective of public and worker health and the environment.
- 4.3.5 Ensure that the contractor meets the requirements of their ISMS program.
- 4.3.6 Determine the need for Operational Readiness Reviews (ORRs) and Readiness Assessments
- 4.3.7 Perform management walk-throughs of EM facilities and operations and assign facilities to staff with program responsibilities to ensure full line management oversight coverage.
- 4.3.8 Provide the contractor with real-time input on any imminent hazard deficiencies, findings, or observations for immediate corrective action.
- 4.3.9 Ensure that the contractor prepares improvement plans or corrective action plans for findings and observations.

- 4.3.10 Track, to completion, all contractor improvement or corrective action plans within their areas of responsibility to ensure compliance with DOE P 450.5.
- 4.3.11 Provide leadership to perform the periodic Authorization Basis document reviews required for the program in support of the COR.
- 4.3.12 Ensure appropriate staff is provided necessary training to allow effective ES&H oversight, including training in the fundamentals of the authorization basis process and the control and use of authorization agreements.

#### **4.4 FACILITY REPRESENTATIVES GROUP LEADER**

- 4.4.1 Directs the implementation of the day-to-day operational awareness and surveillance program for EM facilities and activities for which Facility Representative coverage is provided. (The focus of the Facility Representatives is to observe, evaluate, and report on the effectiveness of the contractor's rigor of operations and implementation of its ISMS program.)
- 4.4.2 Determines facility assignments and activity coverage responsibilities for each Facility Representative and sets priorities for Facility Representative Program oversight activities.
- 4.4.3 Ensures that the Facility Representatives provide real-time feedback to the contractor to achieve timely corrective actions and keeps the EM Program Group Leaders, Team Leaders, EM ES&H Support Team Leader and the COR informed of potential problem areas.
- 4.4.4 Ensures that significant findings and observations generated by the Facility Representatives are documented, that corrective actions developed by the contractor are appropriate to address the findings, and that corrective action closure is validated.
- 4.4.5 Analyzes and trends contractor performance and recommends contractor performance improvement measures to the COR.
- 4.4.6 Performs management walk-throughs of EM facilities and operations.
- 4.4.7 Supports the periodic Authorization Basis document and Emergency

Management Hazard Assessment reviews as directed by the COR.

- 4.4.8 Supports the oversight and evaluation of the contractor's ES&H self-assessment program.
- 4.4.9 Ensures the contractor's ES&H performance evaluations and self-assessment reports are reviewed by appropriate Facility Representatives and ensures that appropriate improvement and corrective action plans are in place and effective.
- 4.4.10 Ensures staff is provided necessary training to allow effective ES&H oversight, including training in the fundamentals of the authorization basis process and the control and use of authorization agreements.

#### **4.5 EM ES&H SUPPORT TEAM LEADER**

- 4.5.1 Develops and recommends to the COR a set of ES&H performance measures and indicators in consultation with the Facility Representatives Group Leader and the Program Group Leaders and Team Leaders.
- 4.5.2 Ensures the contractor's ES&H performance is monitored and the results are documented. (The focus of ES&H subject matter experts is on compliance with ES&H requirements and standards in the context of ISMS implementation.)
- 4.5.3 Provides evaluation input to the COR on the contractor's performance.
- 4.5.4 Ensures the oversight activities for the ES&H functional areas are integrated, coordinated, and documented.
- 4.5.5 Organizes periodic, value-added appraisals of the functional areas and arranges For-Cause Reviews as directed by the AMEM or COR.
- 4.5.6 Ensure that functional area ES&H surveillance and operational awareness reviews are conducted on a regular basis.
- 4.5.7 Ensures that the ES&H subject matter experts (SMEs) provide real-time feedback to the contractors to achieve timely corrective actions and keeps the EM Program Group Leaders, Team Leaders, Facility Representative Group Leader and the CORs informed of potential problem areas.

- 4.5.8 Ensures that significant findings and observations generated by the ES&H SMEs are documented, that corrective actions developed by the contractor are appropriate to address the findings, and that corrective action closure is validated.
- 4.5.9 Analyzes and trends contractor performance and recommends contractor performance improvement measures to the COR.
- 4.5.10 Performs management walk-throughs of EM facilities and operations.
- 4.5.11 Supports the periodic Authorization Basis document and Emergency Management Hazard Assessment reviews as directed by the CORs
- 4.5.12 Supports the oversight and evaluation of the contractor's ES&H self-assessment program.
- 4.5.13 Ensures contractors' ES&H performance evaluations and self-assessment reports are reviewed by appropriate ES&H SMEs and ensures that appropriate improvement and corrective action plans are in place and effective.
- 4.5.14 Ensures staff is provided necessary training to allow effective ES&H oversight.

#### **4.6 EM QUALITY ASSURANCE PROGRAM MANAGER**

- 4.6.1 Maintains the processes for the overall ES&H oversight program for EM.
  - 4.6.1.1 A system to collect EM ES&H oversight program findings and observations that will allow tracking and trending.
  - 4.6.1.2 A comprehensive schedule of the planned ES&H oversight activities of the functional areas, managing the schedule to minimize conflicts.
- 4.6.2 Organizes ORRs and Readiness Assessments and maintains a formal assessment schedule as required by Order DOE 425.1A.
- 4.6.3 Ensures that the required ORRs and Readiness Assessments are performed according to the established schedule and a formal assessment plan
- 4.6.4 Coordinates appropriate corrective action plans and closure criteria for external ES&H audits conducted of EM activities.

- 4.6.5 Coordinates an annual management appraisal of each primary contractor to include ISMS, lessons-learned, Price-Anderson Amendment Act, and performance indicators.
- 4.6.6 Coordinates development and execution of an annual self-assessment plan and schedule for EM.
- 4.6.7 Coordinates a review of the ES&H Oversight Program on an as-needed basis, but at least annually, to provide an opportunity for program adjustments based on experience gained through the program implementation.

## **5.0 PROGRAM STRUCTURE**

- 5.1 The ES&H Oversight Program is not only aimed at confirming compliance on the part of the contractor, but also on evaluating the adequacy, consistency and effectiveness of the contractor's performance.
- 5.2 The EM Leadership Team, Program/Project Managers, the Facility Representatives, and the ES&H SMEs will implement the core oversight program. The functional areas shown in Attachment 1 are the target areas for the oversight program, and will be the object of routine operational awareness, functional appraisals, and assessments.
- 5.3 ES&H Assessments are to be conducted following EM Procedure No. EM-4.1, Assessments.
- 5.4 Operational Awareness will include facility or project walk-throughs for the purpose of making general observations relative to operations, equipment, and facilities to detect any unsafe or potentially unsafe conditions, non-compliant conditions, or activities that are or potentially could adversely affect personnel or the environment. Operational Awareness will also include document reviews, interviews with personnel, follow-up on open and unresolved items or adverse trends, items of historical noncompliance, or deviations from approved work plans, improvement plans, or corrective action plans. The Operational Awareness Review Form (Attachment 2) or the Walk-Through Report Form (Attachment 3) or their equivalent are to be used to document these oversight activities.
- 5.5 Beginning December 15, 2000, and on a quarterly basis thereafter, each EM Program Team Leader is to develop an oversight schedule for the coming quarter. The schedule is to cover planned, documented assessments, and operational awareness reviews, identifying the scope of the oversight activity (e.g., the facility or activity to be reviewed, the ES&H disciplines to be covered) and the desired frequency of each oversight activity during the

quarter.

- 5.6** Beginning December 15, 2000, and on an annual basis thereafter, the EM ES&H Support Team Leader, in consultation with the Program Group Leaders and Team Leaders and the Facility Representative Group Leader, is to develop a schedule for periodic, value-added appraisals of the ES&H functional areas. The information on the contractor's ES&H performance derived from the ES&H Oversight Program, including the results of the contractor's self-assessments and performance measures information provided by the contractor, will be analyzed to identify trends and to focus these periodic appraisals.

## **ATTACHMENT 1**

### **ES&H FUNCTIONAL AREAS**

Integrated Safety Management  
Industrial/Construction Safety  
Chemical Safety  
Transportation Safety  
Industrial Hygiene  
Occupational Medicine/Health Surveillance  
Facility/Nuclear Safety  
Criticality Safety  
Price-Anderson Act  
Authorization Agreements  
Authorization Basis Documents  
Radiation Protection  
Fire Protection  
Environmental Protection/Compliance  
    RCRA  
    Clean Water Act (NPDES)  
    Clean Air Act (including NESHAPS)  
    Toxic Substances Control Act (PCBs)  
    CERCLA/SARA/EPCRA Reporting  
    Underground/Aboveground Storage Tank Compliance  
    Environmental Monitoring  
Emergency Management  
ES&H Training

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ES&H Data Management

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**ATTACHMENT 2**

**OPERATIONAL AWARENESS REVIEW FORM**

<b>Functional Area:</b>	<b>Date of Review:</b>
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Areas Reviewed:

Comments:

Findings:

Observations:

Exit Briefing With:

Review conducted by:

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**ATTACHMENT 3**

**WALK-THROUGH REPORT FORM**

Date Performed:

Performed By:

Functional Area:

Title of Checklist or Reference Used:

Work Location:

Work Description:

Contractor/Subcontractor Company Name:

Comments:

Were findings/observations discussed with workers?  Yes  No  
with their supervision?  Yes  No

Findings/observations were discussed with the following contractor management:

Any findings, observations, or proficiencies below relate to the following ISM Functions if marked: 1.  Define the scope of work. 2.  Analyze the hazards. 3.  Develop and implement hazard controls. 4.  Perform work within controls. 5.  Provide feedback and continuous improvement.

Finding:

Discussion of Finding:

Observation:

Discussion of Observation:

Proficiency:

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Discussion of Proficiency