

06-26-97

SUBJECT: LINE ENVIRONMENT, SAFETY AND HEALTH OVERSIGHT

PURPOSE AND SCOPE

The purpose of this policy is to set forth the Department's expectations for Department of Energy (DOE) line management environment, safety and health (ES&H) oversight and for the use of contractor self-assessment programs as the cornerstone for this oversight. An effective and efficient oversight program can be realized when a vigorous contractor self-assessment program is in place, similar to those used in successful companies. DOE line oversight and contractor self-assessments together ensure that field elements and contractors are adequately implementing the DOE Safety Management System. As a complement to DOE line oversight, the Department's Office of Environment, Safety and Health (EH) provides safety policy, enforcement, and independent internal oversight functions.

This policy statement is based on lessons learned from ES&H line oversight pilots involving several Headquarters' program offices, field elements, and laboratories. The term "contractor," as used in this policy, means a laboratory, a management and operating contractor, an integrated management contractor, or a site support contractor for a government-owned government-operated facility.

This policy statement applies to DOE Headquarters' and field element line organizations and to contractors. It does not apply to the Naval Nuclear Propulsion Program. Additionally, it does not apply to DOE Independent Oversight (e.g., EH-2) or external oversight (e.g., DNFSB).

POLICY

The DOE and its contractors are committed to technically sound, safe, and cost-effective operations supported by solid management systems that ensure protection of the public, the worker, and the environment. It is the Department's policy to conduct ES&H line oversight in a cost-effective, coordinated, integrated, and efficient manner that is seamless to contractors. A high value is placed on the Department's line managers and contractors working together to identify and ensure resolution of ES&H concerns. Both DOE and contractor line managers must acquire and maintain sufficient knowledge of program activities in order to make informed decisions on safety resources for these activities. The Department's line managers fulfill

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their responsibilities in part through line management oversight and have unfettered access to information and facilities in a manner consistent with safety and security requirements. The contractors' line managers fulfill their responsibilities in part through the implementation of self-assessment programs.

The Department's and contractors' line organizations have the following common principles:

- a. Work together to develop ES&H performance objectives, measures, and expectations, tied to Departmental strategic goals and objectives, as well as to performance goals and objectives of the Safety Management System elements. Mutual agreement is reached on expected ES&H performance.
- b. Work together to develop contract performance measures and performance indicators that are linked to the DOE Safety Management System.
- c. Work together to develop a high level of performance assurance which results in improved ES&H performance.

These common principles are fulfilled in full recognition that DOE line management is a customer, and owner, and that the contractor is a supplier. In this regard, an effective customer and supplier relationship must be maintained. By following this philosophy, DOE line management accomplishes its self-regulatory responsibility.

KEY ELEMENTS OF LINE ES&H OVERSIGHT PROCESS

1. A robust, rigorous, and credible contractor ES&H self-assessment program linked to the DOE Safety Management System is in place, which includes elements that address:
 - a. Performance measures and performance indicators
 - b. Line and independent evaluations
 - c. Compliance with applicable requirements (Rules, regulatory standards, contract terms)
 - d. Data collection, analysis, and corrective actions
 - e. Continuous feedback and performance improvement

The results and conclusions of the contractor self-assessments are available to DOE.

2. As an effective contractor self-assessment program is established, the DOE field element oversight function transitions to:
 - a. Operational awareness of contractor work activities, typically through DOE local line managers and staff such as facility representatives, subject matter experts, and other specialists.
 - b. Review of performance against formally established ES&H performance measures, other ES&H performance indicators, and using contractor self-assessments.
 - c. Review and assessment in support of required readiness assessments, operational readiness reviews, Safety Management System documentation and onsite verification reviews, and authorization basis document reviews.
 - d. A periodic, value-added appraisal of sufficient frequency and duration to confirm the contractor's safe performance of work and the effectiveness of the self-assessment program. A cost-effective appraisal meeting the intent of this policy might need to be no more than 2 weeks in duration and no more than once a year at each site. The scope of periodic appraisals, including additional areas of review, is determined by field elements with input from Headquarters and the contractor. DOE uses the analysis of contractor self assessment results, performance measures and operational awareness, as input to scoping the annual appraisal. Appraisals by non-line organizations, such as EH, or external organizations, such as the Environmental Protection Agency and state agencies, are fully considered and not ordinarily duplicated. The appraisals are conducted primarily by DOE employees. Issues identified but unresolved during a periodic appraisal are referred to local DOE personnel (facility representatives, etc.) for further examination.
 - e. For-cause reviews, as necessary.

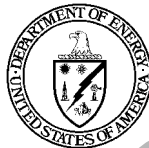
Each field element has a designated focal point for coordinating oversight activities, including for-cause reviews.

3. The Headquarters line functions of ES&H oversight are:
 - a. Monitor field element and contractor performance through the review of information provided by field elements, contractors, EH, and external organizations, such as the Defense Nuclear Facilities Safety Board.

- b. When appropriate, participate in field element appraisals, assessments, surveillances, and walkthroughs of contractor facilities and activities.
- c. Conduct onsite reviews of field element performance, including verification of their appraisals of the contractor, as necessary.
- d. For cause reviews, as necessary.

Headquarters' line managers coordinate their oversight functions with field elements through the designated landlord for each site.

BY ORDER OF THE SECRETARY OF ENERGY:



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