



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

EXECUTIVE OFFICE

June 2, 2015

In reply refer to: A-7

MEMORANDUM FOR ELLIOT E. MAINZER, ADMINISTRATOR and CHIEF EXECUTIVE OFFICER,
BONNEVILLE POWER ADMINISTRATION

THROUGH:

CLAUDIA R. ANDREWS *Claudia R. Andrews*
CHIEF OPERATING OFFICER, BONNEVILLE POWER ADMINISTRATION
JOHN L. HAIRSTON *John L. Hairston*
DEPUTY CHIEF ADMINISTRATIVE OFFICER (ACTING), BONNEVILLE POWER
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THOMAS A. MCDONALD *Thomas A. McDonald*
CHIEF COMPLIANCE OFFICER, COMPLIANCE AND GOVERNANCE (ACTING),
BONNEVILLE POWER ADMINISTRATION

FROM:

BRAD A. BEA *Brad A. Bea*
CHIEF SAFETY OFFICER, BONNEVILLE POWER ADMINISTRATION

SUBJECT:

DIRECTIVES EQUIVALENCY APPROVAL MEMORANDUM

PURPOSE: To document BPA's equivalencies to Order 225.1B, *Accident Investigations*.

BACKGROUND: On March 4, 2011, DOE O 225.1B was approved. All Power Marketing Administrations were identified as exempt from DOE O 225.1B.

JUSTIFICATION: BPA's Incident Investigation Program follows the intent of this order primarily through BPAM Chapter 181 Accident Investigation and Reporting Policy and by training BPA Incident Investigation Board members using the DOE Accident Investigation curriculum to ensure alignment with DOE O 225.1B. The single exception to this is related to prime contractors performing work for BPA.

BPA's relationship with contractors is markedly different than the relationship DOE has with its Management and Operating contractors as defined in the Federal Acquisition Requirements Subpart 17.6-Management and Operating Contracts. BPA is granted independent contracting


authority pursuant to the Bonneville Project Act of 1937 (16 U.S.C. § 832a(f)) and is exempt from the Federal Acquisition Regulations (FAR) pursuant to the Federal Property and Administrative Services Act of 1939. As such BPA does not utilize Contract Requirements Documents (CRD) referenced in this Order (Policy, etc.). With regard to BPA contractors, all requirements and expectations for both BPA and its Contractors are incorporated into the Bonneville Purchasing Instructions (BPI) requiring contractors to comply with all BPA policies.

BPA requires its prime contractors to conduct their own investigations per criteria included in BPA's Incident Investigation Procedure. The requirements and expectations for these investigations are incorporated into the Bonneville Power Purchasing Instructions (BPPI) safety contract clauses.

It should be noted that BPAM 181 Accident Investigation and Reporting Policy is currently being updated to more closely align with DOE O 225.1B. The updates will appear in BPA Policy 420 Occupation Safety and Health, the Incident Investigation and Reporting Procedure that will be incorporated into the BPA Safety and Health Manual (by the end of FY15), and the Bonneville Power Administration Safety Management Program and supporting procedures.

RECOMMENDATION: Recommend that you approve this equivalency document.

Elliot E. Mainzer, Administrator and Chief Executive Officer, Bonneville Power Administration

APPROVE:  DISAPPROVE: _____ DATE: 5/26/15

CONCURRENCES/ CONSULTATIONS: Bill McArthur
Director of Office of Worker Safety and Health Policy.

cc:

Skila Harris

Senior Advisor, Power Marketing Administration, Department of Energy