



## Department of Energy

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

EXECUTIVE OFFICE

July 20, 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  
THOMAS A. MCDONALD *Thomas A. McDonald*  
CHIEF COMPLIANCE OFFICER, COMPLIANCE AND GOVERNANCE (ACTING),  
BONNEVILLE POWER ADMINISTRATION

FROM:

LORRI BODI *Lorri Bodi*  
VICE PRESIDENT, ENVIRONMENT, FISH & WILDLIFE, BONNEVILLE POWER  
ADMINISTRATION

SUBJECT:

DIRECTIVES EXEMPTION APPROVAL MEMORANDUM

**PURPOSE:** To document BPA's ongoing exemption from DOE Order 226.1B, *Implementation of DOE Oversight Policy*.

**BACKGROUND:** This Order establishes requirements and provides direction for implementing Department of Energy (DOE) Policy (P) 226.1B, *Department of Energy Oversight Policy*.

**JUSTIFICATION:** Paragraph 3.c (C) of this DOE specifically expresses the following:

*"Consistent with Secretarial Delegation Order Number 00-033.00B to the Administrator and Chief Executive Officer, Bonneville Power Administration, this Order does not apply to oversight of environmental programs or occupational safety and health programs at Bonneville Power Administration."*

It should be noted that several DOE facilities (i.e. National Labs) are wholly operated and maintained by contractors. This order provides DOE accountability for contractor managed facilities as evidenced by paragraphs 4.a (1) and (2) of the Order as follows:

**"4. REQUIREMENTS.**

*a. All applicable DOE organizations must:*

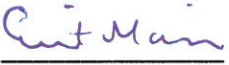
*(1) Establish and implement an effective oversight program consistent with DOE P 226.1B and the requirements of this Order.*

*(2) Maintain sufficient technical capability and knowledge of site and contractor activities to make informed decisions about hazards, risks, and resource allocation; provide direction to contractors; and evaluate contractor performance."*

The fact that BPA's facilities are managed by Federal/DOE employees makes the content of this Order not applicable to BPA's operations. Therefore, relinquishing BPA's current exemption from DOE Order 226.1B would result in BPA rate-payer costs, without added value.

**RECOMMENDATION:** Recommend approval of this exemption memo to DOE order 226.1B because there are no BPA facilities wholly managed by contractors.

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

APPROVE:  DISAPPROVE: \_\_\_\_\_ DATE: 10/9/15

**CONCURRENCES/ CONSULTATIONS:** Melanie May, Office of Environment, Health, Safety and Security, AU.

cc:

Skila Harris

Senior Advisor, Power Marketing Administration, Department of Energy