



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

CHIEF OPERATING OFFICER, BONNEVILLE POWER ADMINISTRATION

JOHN L. HAIRSTON

DEPUTY CHIEF ADMINISTRATIVE OFFICER (ACTING), BONNEVILLE POWER
ADMINISTRATION

THOMAS A. MCDONALD

CHIEF COMPLIANCE OFFICER, COMPLIANCE AND GOVERNANCE (ACTING),
BONNEVILLE POWER ADMINISTRATION

FROM:

BRAD A. BEA

CHIEF SAFETY OFFICER, BONNEVILLE POWER ADMINISTRATION

SUBJECT:

DIRECTIVES EQUIVALENCY APPROVAL MEMORANDUM

PURPOSE: To document BPA's equivalency to DOE P 450.4A, *Safety Management System Policy*, and DOE Order 450.2, *Integrated Safety Management*.

BACKGROUND: BPA has adopted the Safety Management System ANSI Z10-2012 which is similar to DOE's Integrated Safety Management (ISM). This memo describes this equivalency and the relevance to BPA.

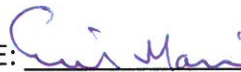
JUSTIFICATION: BPA's Safety Program follows the intent of DOE P 450.4A. ANSI Z10-2012 is the Safety Management System that BPA uses. It integrates safety into how all work is planned, executed and controlled. ISM was designed for implementation in the DOE environment. BPA selected ANSI Z10-2012 Safety Management System Standard to better align BPA safety and health functions with electric utility industry best practice. The ANSI Z10-2012 standard provides BPA a recognized industry best practice standard. The ANSI Z10-2012 standard is designed to allow for compliance with the standard without disrupting business operations. Full

conformance with the ANSI Z10-2012 standard will meet or exceed the intent of these DOE Directives and the overall direction from associated Orders. In addition, adopting ISM, and its associated Orders, would require an organizational-wide assessment of BPA's business operations and result in an extensive and costly redesign of existing business operations. Any resulting changes may not align with standard electric utility operations.

BPA's Safety Policy is identified in BPA Policy 420 and its safety program is outlined in BPA's Safety and Health Program Handbook. BPA consulted with Bill McArthur, Director, Office of Worker Safety and Health Policy (HS-11), to validate BPA's analysis of DOE Order 450.2, including the findings that the Order was not developed with consideration of BPA's organizational structure or the electric utility industry and could not be adopted by BPA as written.

RECOMMENDATION: Recommend that you approve this equivalency document.

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

APPROVE:  DISAPPROVE: _____ DATE: 6/26/15

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

cc:

Skila Harris

Senior Advisor, Power Marketing Administration, Department of Energy