

EFCOG Best Practice #118

(02/12/12)

Best Practice Title: Integration of Multiple Annual Submittals into ISMS Annual Report

Facility: Savannah River Site (Savannah River Remediation, LLC)

Point of Contact: David Lester, (803) 208-8743), david.lester@srs.gov

Brief Description of Best Practice: For organizations that have established their Integrated Safety Management Systems as the overarching management system for their Worker Safety and Health Program (WS&HP), Contractor Assurance System (CAS), Quality Assurance Management Plan (QAMP), and Voluntary Protection Program (VPP), the development of a single annual document is a means to eliminate redundant information from six separate submittals (ISM Annual Description, and ISM Annual Declaration, WS&HP Plan Annual Update, Contractor Assurance System (CAS) Annual Update, Quality Assurance Management Plan (QAMP) Annual Update and VPP Annual Report).

Why the Best Practice was used: Elimination of six separate documents with similar information simplifies the preparation of the annual reporting process for both the contractor preparing the submittal and the DOE personnel who normally review them.

What are the benefits of the Best Practice: Implementation of the practice can, depending on additional instructions from both DOE headquarters and DOE site personnel, significantly reduce the preparation and review time. For example, elimination of the replication of the common descriptive elements contained in past ISM Description Document reduced the size of the submittal by over seventy percent. This allows the preparing contractor to focus on the objective evidence of the health of their ISM, WS&HP, CAS, QAMP, and VPP, and reduces the review and evaluation time.

What problems / issues were associated with the Best Practice: The contractors must still maintain an accurate, current description of their ISMS, WS&HP, CAS, QAMP, and VPP. This means that there has to remain an eye on changes to these programs so that, if a significant change occurs, that change can be delineated in the ISM Annual Description. In addition, moving to a consolidated declaration document had to be well socialized with the DOE personnel who would be receiving it so that their concerns over missed information could be negated.

How the success if the Best Practice was measured: Acceptance of the consolidated ISM Annual Report by the DOE customer were the principle means to measure the success of the document and its philosophy.

Description of process experience using the Best Practice (see attached presentation): Individuals responsible for the development of the annual submittals for the various health and safety related programs perform their evaluations of the effectiveness of those programs as they have done in the past. For SRR, this includes the evaluation of the following programs and systems:

- Facility Evaluation Board (FEB) Assessments
- Consolidated Hazard Analysis Process (CHAP) Reviews
- Performance against Performance Objectives, Measures, and Commitments (POMCs)
- Evaluation against DOE Continuing Core Expectations (CCEs)
- Nuclear Quality Assurance (NQA-1) Audits
- Regulatory Assessments/Audits
- Environmental Management System (EMS)
- Independent Assessment Program Assessments
- Performance Indicators
- Earned Value Management System (EVMS) Evaluations
- Self/Management Assessments
- Voluntary Protection Program (VPP) Annual Review
- Contract Assurance Process (CAP) Reviews

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- Quality Assurance Management Plan (QAMP) (including QA Metrics)
- Performance Analysis (PA 2) Annual Reports
- Operational Readiness Reviews (ORR)/Readiness Assessments (RAs)
- Performance Analysis (PA1) Quarterly Reports
- Executive Safety Quality Board (ESQB) Reviews
- Non-Compliance Tracking System/Price-Anderson Amendments Act (PAAA) Screening Reviews

Instead of each of the six safety and health program leads developing a separate submittal based on their interpretation of the output from these program areas, a single submittal is created that satisfies the requirements for all of them.

DOE & SRR Partnering



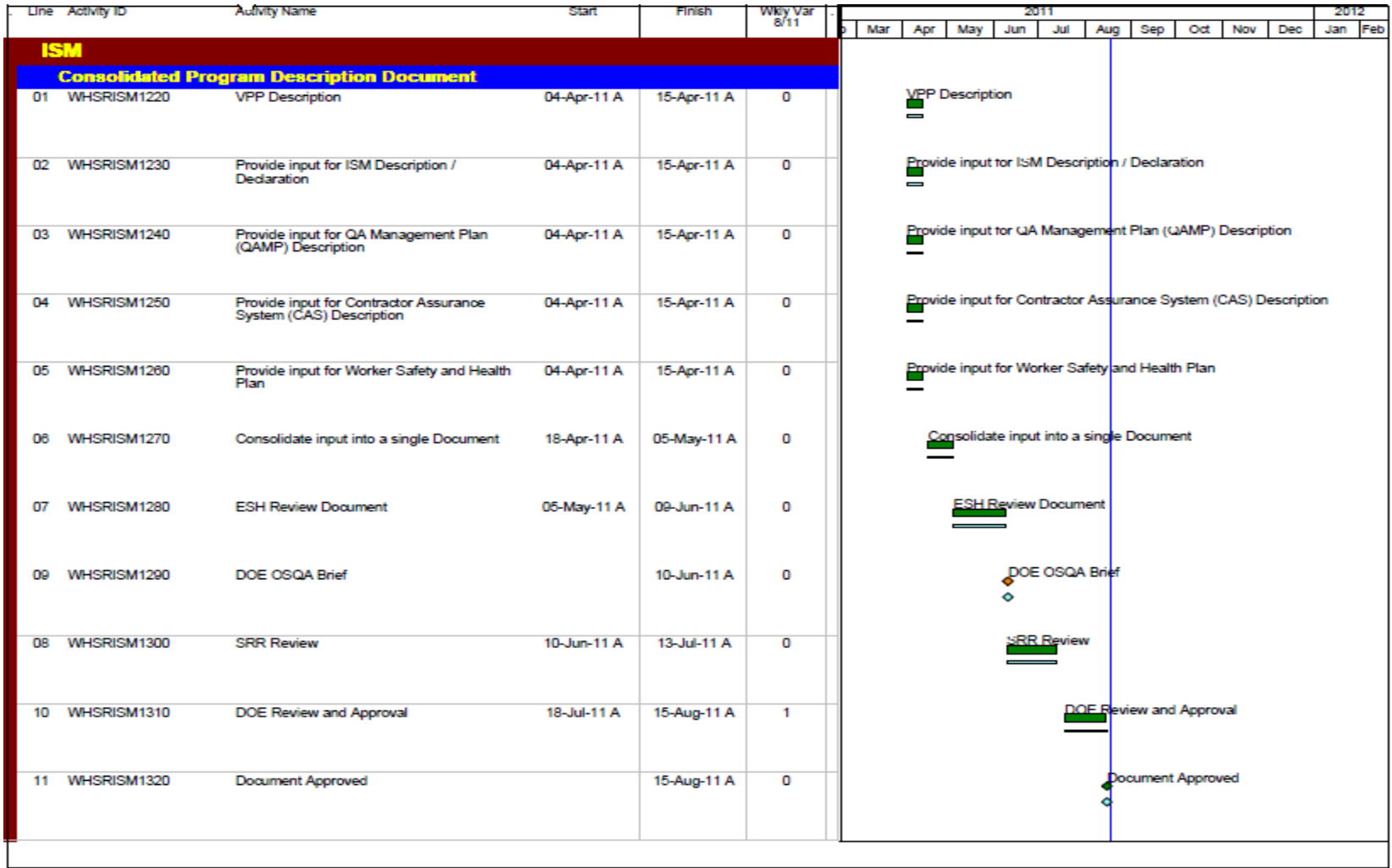
“How” and not “What” and “When”



SRR Integrated Safety Management System: A Comprehensive
Description of the System, Implementation, and Annual Effectiveness –
FY2011

2011 DOE ISM Champions Workshop

We do the right thing.



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- Integrated Safety Management System Description
- Worker Safety and Health Program
- Quality Assurance Management Plan
- Contractor Assurance System Description
- Voluntary Protection Program Annual Evaluation
- Integrated Safety Management System Declaration of Effectiveness



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ISM Description/Declaration

- DOE Policy 450.4A, *Integrated Safety Management Policy*
- DOE Order 450.2, *Integrated Safety Management*



Quality Assurance Management Plan

- 10 CFR 830 Subpart A, *Quality Assurance Requirements*
- DOE Order 414.1C, *Quality Assurance*

Contractor Assurance System Description

- DOE Policy 226.1, *Department of Energy Oversight Policy*
- DOE Order 226.1, *Implementation of Department of Energy Oversight Policy*
- *EM Corporate Performance Metrics System For Quality Assurance Programs*

Voluntary Protection Program Annual Evaluation

- DOE/EH-0434, *Department of Energy Voluntary Protection Program – Part II: Procedures Manual*



Worker Safety and Health Program

- 10 Code of Federal Regulations (CFR) 851, *Worker Safety and Health Program*

- 1 Document vs. 6 Documents
- 50% Reduction in the number of total Pages



Reduction in volume
primarily due to standard language used in all.



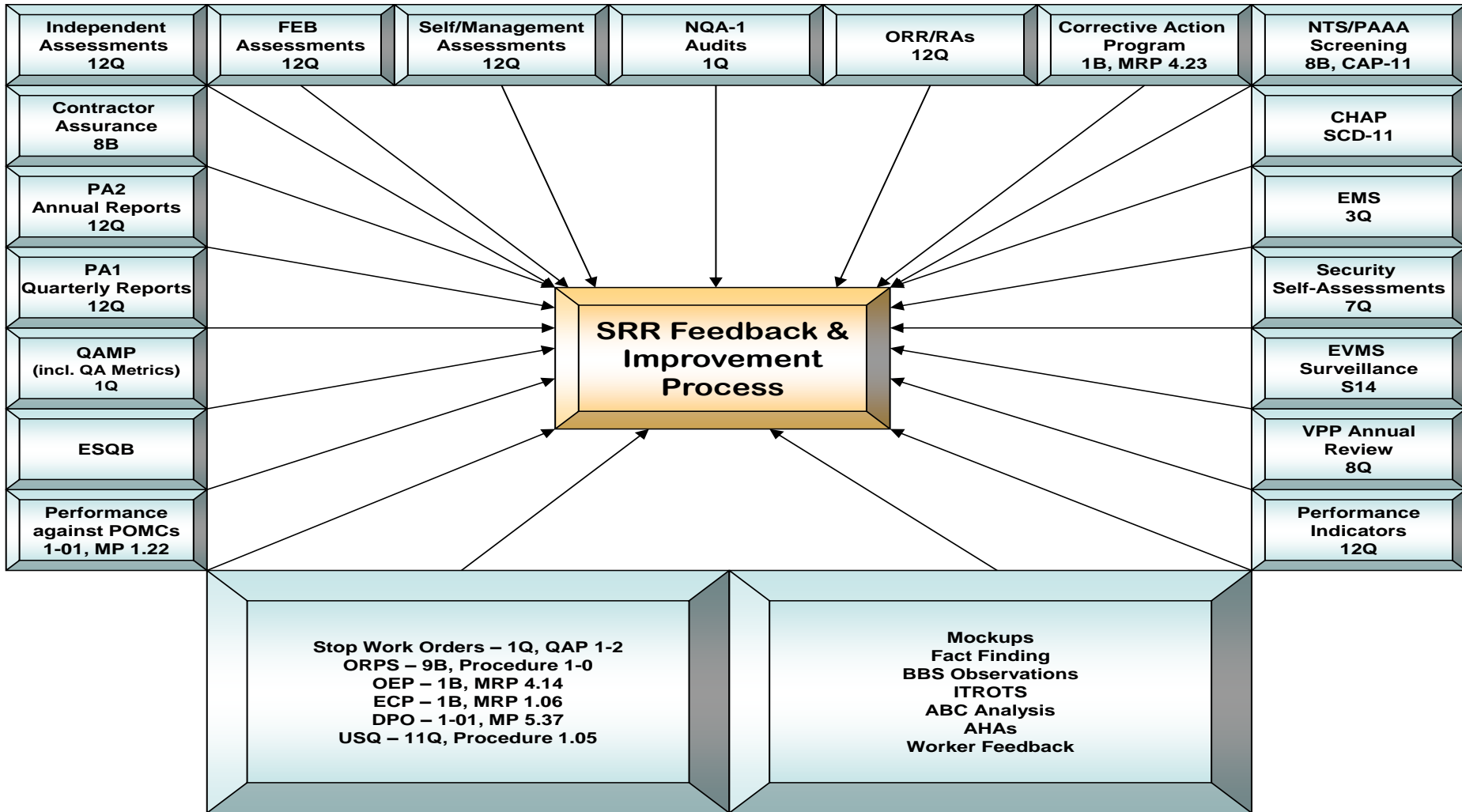
Reflects the true integration of SRR Management Systems

Reflects SRR and DOE Continuous Improvement

Reduces opportunity for conflict between individual Submittals

Allows a holistic concurrent review of all major elements of ISM

We do the right thing.



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- **Submitting the consolidated report on 7/15 coincides with the SRR 3rd Quarter Performance Analysis report, reflecting input from all Functional Area Managers.**
- **Effectiveness determined from**
 - Functional Area Manager program reviews
 - Integrated Independent Evaluation input
 - Integrated Assessment Plan results
 - Startup readiness reviews
 - Annual safety culture survey

“The (DOE-SR) Office of Safety and Quality Assurance concurs with the report...”



DOE-SR Manager of Safety and Quality Assurance Robert Edwards and SRR ESH&QA Director Patricia Allen Signing the Consolidated ISMS Description/Declaration Document



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802
AUG 15 2011

Kathryn B. Burnau, Manager
Contract Administration,
Procurement and Property Services
Savannah River Remediation, LLC
Building 766-H, Room 2007
Aiken, SC 29808

Dear Ms. Burnau:

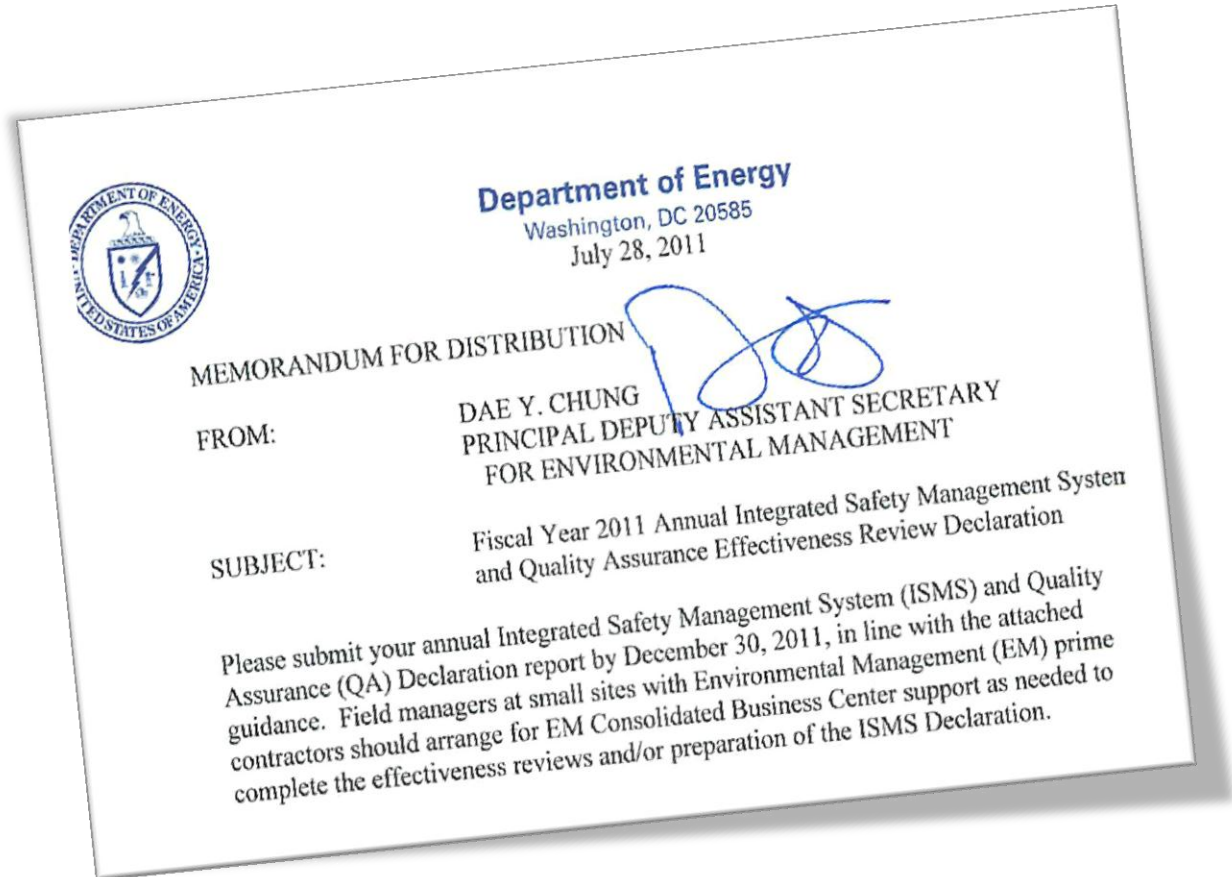
SUBJECT: Contract DE-AC09-09SR22505 - Request for Approval - Savannah River Remediation, LLC (SRR) Integrated Safety Management System (ISMS): A Comprehensive Description of the System Implementation, and Annual Effectiveness - Fiscal Year 2011 (FY11); SRR-CAA-2011-00336 (Letter, Burnau to Morton)

Ref: FY11 Annual ISMS and Quality Assurance Effectiveness Review Declaration, dated July 28, 2011 (Memo, Chung to Distribution)

The Department of Energy Savannah River Operations Office (DOE-SR) has reviewed the subject report - ISMS: A Comprehensive Description of the System Implementation, and Annual Effectiveness - FY 2011. The Office of Safety and Quality Assurance concurs with the report

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- FY11 POMCs
- Address EM supplemental effectiveness declaration criteria
- Submittal of FY12 POMCs



Planned continued improvement for FY12 includes:

- Consolidating 3rd Quarter Performance Analysis report with the ISM Description/Effectiveness Declaration
- Performing expanded assessments to evaluate ISM/VPP effectiveness (for FY12 and other years when an Integrated Independent Evaluation is not performed)



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Tricia Allen
Savannah River Remediation
803-208-3152
patricia.allen@srs.gov

Robert Edwards
DOE-Savannah River
803-952-8105
robert-e.edwards@srs.gov