

Management System Description:

Safety and Health

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1.0 Purpose

The purpose of this Management System is to provide for the EMCBC a consistent method to effectively and efficiently oversee and manage work and operations in a manner that ensures the health and safety of all Federal and contractor personnel and the protection of the environment and the public. This Management System will aid in the implementation of the Integrated Safety Management (ISM) programs which include Environmental Management Systems (EMS). In addition, this Management System Description will assist in the implementation of Emergency Management and Package and Transportation Safety. Subject Area Descriptions and procedures for this Management System are listed in Section 5.0.

2.0 Responsibilities

The table below represents the high-level responsibilities of EMCBC managers and employees for S&H aspects in their work. The table presents roles and responsibilities specific to this Management System.

Roles	Responsibilities
Director and Deputy Director EMCBC	<ul style="list-style-type: none">Utilizing specific authorities delegated from Assistant Secretary for Environmental Management, are the Line Managers responsible and accountable to the Assistant Secretary for Environmental Management for the safety and protection of Federal and contractor employees assigned to the EMCBC.Assure S&H performance within established policy and clearly stated expectations within assigned organizational responsibilities (e.g., assigned EMCBC staff and all Small Site Offices).Routinely communicate with Assistant Secretary for Environmental Management on S&H issues and performance and develop and implement corrective

	actions, as appropriate.
Assistant Director for the Office of Technical Support and Asset Management (OTSAM)	<ul style="list-style-type: none"> • Utilizing specific authorities delegated from the Director EMCBC, is the Manager responsible and accountable for the safety and protection of the Federal employees assigned to the EMCBC. • Within programmatic responsibilities, assures the EMCBC budget is properly formulated to adequately support S&H at the EMCBC, including funding for S&H Staff, personal protective equipment, and travel. • Communicates directly with EMCBC Small Site Federal Project Directors (FPDs) regarding Safety and Health performance expectations for site operations. • May direct independent project assessments that include S&H programs. • In accordance with delegated authorities, develops EMCBC specific policies related to S&H and assists in their effective and consistent implementation across the EMCBC sites. • Reviews, evaluates, and recommends EMCBC approval of S&H plans that support the operation of Small Sites. • Benchmarks S&H performance of EMCBC facilities against industry and other Government standards to support EMCBC efforts to continually enhance its S&H programs. • Provides technical resources and support to EMCBC supported Small Sites/Projects Federal Project Directors and Field Element Managers within the resource and technical competency constraints of the organization.
Division Director, Safety & Quality	<ul style="list-style-type: none"> • Has Line Manager responsibility for the EMCBC personnel who function as Subject Matter Experts in the Environmental, Safety, Health, & Quality and Performance Assurance Teams. • Is responsible and accountable to the Assistant Director of OTSAM for developing and maintaining this MSD, it's Subject Areas, and it's implementing procedures. • Implementation of the S&H programs and procedures, throughout the EMCBC and Small

	<p>Sites.</p> <ul style="list-style-type: none"> • Provides annual and midyear performance evaluations of the ESHQ&PA Group. • Establishes skills and initial and continuing training necessary for the ESHQ&PA Group. • Ensures that its oversight personnel have the skill set and training needed to perform effective oversight and assessments.
<p>Small Site Federal Project Directors(FPDs)/Field Element Managers (FEMs)</p>	<ul style="list-style-type: none"> • Utilizing specific authorities delegated from Assistant Secretary for Environmental Management are the EMCBC Line Managers responsible and accountable for the safety and protection of Federal and contractor employees, the environment, and the public at the site. • Routinely communicate with Director and Deputy Director EMCBC, as well as the Assistant Director for the Office of Technical Support and Asset Management on S&H matters and performance. • Develop and implement corrective actions, as appropriate. • In conjunction with the Assistant Director for the Office of Technical Support and Asset Management OTSAM, evaluate S&H performance under their respective Management and Operating (M&O) contracts. • Set contract performance, measures and objectives.

<p>Safety & Quality Division Staff</p>	<ul style="list-style-type: none"> • Are knowledgeable in S&H matters and issues to participate in the development and maintenance of EMCBC’s S&H Management System, including processes, practices, and procedures. • Ensures that S&H requirements are followed by EMCBC personnel (i.e. workplace safety, emergency response etc.); • Assists in the development of S&H and oversight requirements and expectations and ensures that these requirements are placed into contracts. • Prepares and maintains Description Documents and Procedures that support Safety & Health Management System. • Support the performance of oversight of contractor work to evaluate its adequacy.
<p>Contracting Officer (CO) and Contracting Officer Representative (COR)</p>	<ul style="list-style-type: none"> • Based upon delegated authority from the EM Head of Contracting Authority, the CO awards, administers, and terminates contracts, which includes the insertion of appropriate S&H requirements into contracts. For purposes of this Management System, the CO and COR are responsible for monitoring contract performance and notifying the contractor of any S&H concerns/deficiencies.
<p>EMCBC Employees</p>	<ul style="list-style-type: none"> • Are responsible for understanding and complying with S&H requirements and expectations relevant to their assigned duties, including their own immediate personal safety as well as the safety of their colleagues in the course of daily activities.

3.0 Management System Operation

3.1 Overview

The EMCBC implements safety, and health programs and activities to protect its workers, the public, and the environment utilizing the principles and functions of ISM. Federal EMCBC staff: (1) ensure that applicable S&H requirements are followed by EMCBC personnel; (2) ensure that appropriate S&H requirements are placed into contracts; (3) provide oversight of contractor S&H work, planning, and controls; (4) integrate continuous feedback and improvement mechanisms

into their work; and (5) perform the necessary oversight/assessments of the Federal EMCBC staff and its contractors.

This Management System provides the processes and procedures to ensure that EMCBC S&H expectations and requirements are identified, communicated, and implemented by EMCBC Federal staff, support service contractors and Small Site contractors. Effective implementation of this Management System will help ensure the safety and health of staff and the public, and protection of the environment. This is accomplished by (1) the oversight, assessment, and evaluation of both Federal EMCBC staff and contractor performance and (2) reporting of S&H performance data to EMCBC and other entities (e.g., U.S. Department of Energy [DOE] and, as appropriate, Federal, state, and local governments).

3.2 Key Functions/Services and Processes of Safety, and Health

3.2.1 Managing Integrated Safety Management

EMCBC S&H functions, responsibilities, and authorities for the Federal EMCBC staff are included in the [EMCBC Functions, Responsibilities, and Authorities \(FRA\)](#). The [EMCBC ISM System Description](#) establishes a program whereby Federal EMCBC staff plan, perform, assess, and improve the safe conduct of work and protection of the environment. ISM is institutionalized through DOE directives that establish the Department-wide safety management objectives, guiding principles, and core functions. The Guiding Principles provide overall direction and guidance for instituting ISM. The five Core Functions provide the necessary structure and are applied as a continuous cycle with the degree of rigor appropriate to address the activity and hazards involved.

EMCBC is committed to an appropriately trained workforce to ensure the proper implementation of S&H requirements in mission activities. EMCBC personnel shall have and maintain competencies commensurate with their S&H responsibilities. The general processes for meeting S&H training and qualification expectations are found in the EMCBC Federal Occupational Safety and Health (FEOSH) Plan and EMCBC Occupant Emergency Plan. EMCBC organizations are expected to maintain a performance assurance process to ensure that Federal EMCBC staff and support service contractors are implementing their S&H requirements and responsibilities. Environmental Management Headquarters and EMCBC performance assessments are used to measure EMCBC performance collectively, as well as EMCBC organizations' S&H performance against mission, goals, and objectives, and to provide feedback and improvement mechanisms for needed improvements and corrective actions. The assurance process will help ensure EMCBC compliance with program requirements (e.g., Federal Employee Occupational Safety) and line management oversight of S&H responsibilities.

The EMCBC is committed to a safety culture whereby DOE staff and contractors can identify safety issues without fear of reprisal. DOE and Contractor employees should never feel that schedule milestones are more important than S&H issues. However, if an employee believes that safety is being compromised, the EMCBC Employee Concerns Program is one mechanism for employees and contractors to identify the issues and track them to closure. Employees are encouraged to identify issues and managers are encouraged and held accountable to resolve

them. DOE staff will not always agree on S&H issues. To ensure that resolution of differences is accomplished, a procedure on Differing Professional Opinions (DPO) has been developed.

3.2.2 Safety and Health Management and Oversight of Contractors

A principal responsibility of EMCBC is to administer its contracts and maintain oversight of its contractors to ensure the performance of work in a safe, reliable, and environmentally compliant manner. EMCBC is responsible for ensuring that contract work is (1) planned, authorized, and executed in accordance with applicable S&H Federal, state, and local laws and regulations, and DOE and EMCBC directives and (2) that contractor S&H performance and self-assessment programs are evaluated. Oversight is performed by trained and qualified Federal staff at the Small Site/Projects and supported by EMCBC SME when requested. The EMCBC conducts assessments using either site procedures or EMCBC Oversight and Assessment procedures and Criteria Review and Approach Documents (CRADs) developed in advance of the assessment and documented in the Quality Assurance and Oversight Management System. Line Management oversight is performed through interfaces with contractor counterparts, attendance at meetings, periodic walkthroughs of work spaces and facilities, and by performing scheduled and/or required assessments of contractor programs and performance. Federal oversight is used as a basis for providing feedback to the contractor. Federal staff oversight of contracts ensures that the integrity of the contractors' ISMS programs is maintained. This process helps to ensure that contractors maintain their ISM programs and make the appropriate adjustments as lessons are learned and budgets and missions change. The EMCBC staff augments and/or supports DOE Line Management Oversight and work through the Federal Project Director/Field Element Manager who typically serve as the Contracting Officers Representative to the contractor.

The Office of Contracting typically includes the following in applicable contracts: (1) S&H requirements, including ISMS; (2) contractor S&H performance expectations; and (3) the Performance Evaluation Management Plan, which includes S&H objectives and metrics.

3.2.3 Packaging & Transportation Safety

This subject area describes how Packaging and Transportation (P&T) Safety activities supporting the EMCBC Small Sites missions are performed in a safe and compliant manner. This subject area provides information regarding requirements for offsite shipment of radiological and hazardous materials and waste. It also provides guidance for performing oversight of contractor P&T Programs.

3.2.4. Emergency Management & Continuity of Operations

This subject area describes how Emergency Management and Continuity of Operations Planning activities supporting the EMCBC and EM Small Sites missions are performed in a safe and compliant manner. This subject area provides information regarding requirements for base emergency (all hazards) planning, performing hazards surveys, hazard assessments and continuity of operations planning.

4.0 Requirements

4.1 Primary Responsibility

This Management System has primary responsibility for ("owns") the following requirements:

Document	Title
10 CFR 71	Packaging and Transportation of Radioactive Material
10 CFR 820	Procedural Rules For DOE Nuclear Activities
10 CFR 830, Subpart B	Safety Basis Requirements
10 CFR 835	Occupational Radiation Protection
10 CFR 850	Chronic Beryllium Disease Prevention Program
10 CFR 851	Worker Safety and Health
29 CFR 1904	Recording and Reporting Occupational Injuries and Illnesses
29 CFR 1910	Occupational Safety and Health Standards
29 CFR 1960	Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters
40 CFR 112	Oil Pollution Prevention
40 CFR 116	Designation of Hazardous Substances
40 CFR 117	Determination of Reportable Quantities for Hazardous Substances
40 CFR 261	Identification and Listing of Hazardous Waste
40 CFR 262	Standards Applicable to Generators of Hazardous Waste
40 CFR 263	Standards Applicable to Transporters of Hazardous Waste
40 CFR 264	Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

40 CFR 265	Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
40 CFR 266	Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities
40 CFR 267	Standards for Owners and Operators of Hazardous Waste Facilities Operating Under a Standardized Permit
40 CFR 273	Standards for Universal Waste Management
40 CFR 302	Designation, Reportable Quantities, and Notification
40 CFR 350	Trade Secrecy Claims for Emergency Planning and Community Right-To-Know Information: And Trade Secret Disclosures to Health Professionals
40 CFR 355	Emergency Planning and Notification
40 CFR 704	Reporting and Recordkeeping Requirements
40 CFR 710	TSCA Chemical Inventory Regulations
40 CFR 761	Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution In Commerce, and Use Prohibitions
48 CFR 970.5223-1	Integration Of Environment, Safety, And Health Into Work Planning And Execution (Also Called The ISMS Clause)
49 CFR 105	Transportation; Hazardous Material Program Definitions and General Procedures
49 CFR 106	Transportation; Rulemaking Procedures
49 CFR 107	Transportation; Hazardous Materials Program Procedures
49 CFR 110	Transportation; Hazardous Materials Public Sector Training and Planning Grants

49 CFR 130	Transportation; Oil Spill Prevention and Response Plans
49 CFR 171-179	Transportation; General Information, Regulations, and Definitions etc.
49 CFR 180	Transportation; Continuing Qualification and Maintenance of Packaging's
49 CFR 350-397	Federal Motor Carrier Safety Regulations
DEAR 970.5223-1	Integration of Environment, Safety, and Health into Work Planning and Execution
DOE O 150.1	Continuity Programs
DOE 151.1C	Comprehensive Emergency Management System
DOE O 225.1B	Accident Investigations
DOE O 231.1B	Environment, Safety And Health Reporting
DOE O 232.2	Occurrence Reporting And Processing Of Operations
DOE N 251.86	Extension of DOE N 234.1, Reporting of Radioactive Sealed Sources
DOE O 410.1	Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements
DOE P 420.1	Department Of Energy Nuclear Safety Policy
DOE O 420.1B, Change 1	Facility Safety
DOE O 425.1D	Verification of Readiness to Start Up or Restart Nuclear Facilities
DOE O 440.1B	Worker Protection Management For DOE (Including The National Nuclear Security Administration) Federal Employees
DOE M 441.1-1	Nuclear Material Packaging Manual
DOE O 450.2	Integrated Safety Management

DOE P 450.4A	Integrated Safety Management Policy
DOE-HDBK-3027-99	ISM Team Leader Handbook
DOE O 458.1, Admin. Change 2	Radiation Protection Of The Public And The Environment
DOE O 460.1C	Packaging And Transportation Safety
DOE M 460.2-1A	Radioactive Material Transportation Practices Manual
DOE O 460.2A	Departmental Materials Transportation And Packaging Management
DOE O 461.1B	Packaging and Transportation for Offsite Shipment of Materials of National Security Interest
DOE O 461.2	Onsite Packaging and Transfer of Materials of National Security Interest
E.O. 12196	Occupational Safety And Health Programs For Federal Employees (Continued by E.O. 13511)
E.O. 12941	Seismic Safety Of Existing Federally Owned Or Leased Building
E.O. 13043	Increasing Seat Belt Use In The United States
E.O. 13058	Protecting Federal Employees and the Public From Exposure to Tobacco Smoke in the Federal Workplace
E.O. 13335	Incentives for the Use of Health Information Technology
E.O. 13513	Federal Leadership On Reducing Text Messaging While Driving
OMB Circular A-119	Memorandum for Heads of Executive Departments and Agencies, Subject: Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities
P.L. 89-272	Solid Waste Disposal Act (SWDA)

5.0 Subject Areas, Program Descriptions, and Guidance Documents

The following Subject Areas are maintained by this Management System:

- [Managing the Integrated Safety Management System](#)
 - [PD-440-04, Federal Employee Occupational Safety and Health \(FEOSH\)](#)
 - [PD-450-04, Integrated Safety Management System Description](#)
 - Procedure 1 - [Review Project Office Federal Integrated Safety Management System](#)
 - Procedure 2, [Review and Approval of Contractor ISMSD](#)
- [Packaging & Transportation Safety](#)
 - Procedure 1, [Approving Contractor Packaging & Transportation Programs](#)
 - Procedure 2, [Obtaining and Using Special Permits and Certification of Compliance](#)
 - Procedure 3, [Approving Radiological Materials Shipments under Security Conditions](#)
- [Emergency Management & Continuity of Operations](#)
 - [Procedure 1, EMCBC Occupant Emergency Plan, PL 472-01, Rev 3](#)
 - Procedure 2, [Ensuring Hazards are Screened](#)
 - Procedure 3, [Base Program Planning](#)
 - Procedure 4, [Hazardous Material Screening](#)
 - Procedure 5, [EMCBC Continuity of Operations Plan](#)

6.0 References

See Current DOE Directives