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1. INTRODUCTION

1.1 Purpose

This program description document (PDD) describes the management structure utilized by CH2M-WG, Idaho LLC (CWI) as the environmental management cleanup contractor at the Idaho National Laboratory (INL). It identifies the line management and functional management structure, summarizes their roles and responsibilities, and outlines interfaces between them. Key organizational management expectations are described.

1.2 Scope

The roles, responsibilities, and processes described in this PDD apply to all CWI organizations and personnel. This document describes interfaces with, but does not directly apply to, non-CWI organizations at the INL Site.

The Subcontractor Requirements Program, as described in PDD-1001, “Subcontractor Requirements Program Description,” consolidates company requirements and expectations from various programs and disciplines to support the overall goal of the safe and efficient performance of subcontracted work. Management Control Procedure (MCP)-1186, “Service Acquisitions,” establishes the ICP-wide process for service acquisitions from subcontractors.

1.3 Background

Prior to February 2005, the INL Site was known as the Idaho National Engineering and Environmental Laboratory (INEEL) under the oversight of the DOE Office of Environmental Management (DOE-EM). In February 2005, the INL was created from the research and development (R&D) divisions of the INEEL as a multipurpose laboratory with a mission of leading the renaissance in nuclear energy for the United States under the DOE Office of Nuclear Energy, Science and Technology (DOE-NE). The INEEL divisions performing cleanup of the INL Site stayed under management of BBWI until May 2005, when CWI became the contractor for the Idaho Cleanup Project (ICP).

2. ICP CONTRACT AND ORGANIZATION

The CWI contract for the ICP is a cleanup contract, as opposed to the previous contracts that were M&O contracts. It is a cost plus incentive fee (CPIF) contract that includes cost and schedule performance incentives, as well as disincentives. CWI is responsible for planning, managing, integrating, and executing the ICP work scope and furnishing all

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requisite personnel, facilities, equipment, supplies, and services; except those furnished by DOE as government-furnished services and items (GFS&I), as necessary to successfully perform the work scope in a safe, efficient, and environmentally responsible manner. CWI operates under a project management structure as shown in Figure 1. Within that structure, the following management priorities have been provided for all levels of ICP management:

- A. Employee safety is paramount
- B. Employees must be able to trust management to address their concerns
- C. Employees must perform work using established processes.

2.1 Line and Functional Management

Line management is defined as any “management level within the line organization, including contractor management, that is responsible and accountable for directing and conducting work.” This definition is included in DOE Guide (G) 450.4-1C, “Integrated Safety Management System Guide.”

Area projects, such as Waste Management (WM); Decommissioning and Decontamination (D&D), Environmental Restoration (ER), and the Accelerated Retrieval Project (ARP); Idaho Nuclear Technology and Engineering Center (INTEC); Integrated Waste Treatment Unit (IWTU); and the Calcine Disposition Project; are considered to be line management and report to the Office of the President. Details will be specified in individual organization documents and announcements.

Functional management is the management responsible for defining, interpreting, and maintaining functional requirements, and for supporting line management in their implementation. Company level functional requirements may be administered by an area project for the ICP (e.g., hoisting and rigging administered by INTEC).

Functional Support (non-line management) areas such as, Administrative Services, Finance / Information Technology, Legal, Audit, Employee Concerns Program, Environment, Safety, Health and Quality (ESH&Q), Operations Improvement, Project Planning and Integration, Strategic Planning, and Communications / Government Affairs, Safeguards, Security, and Counter-Intelligence; Operations Technical Support; and the Chief Engineer report either directly or through direct reports to the Office of the President. Responsible managers (RM), functional support managers (FSMs), and subject matter experts (SMEs) work closely together to ensure that implementation of standards and requirements is integrated companywide.

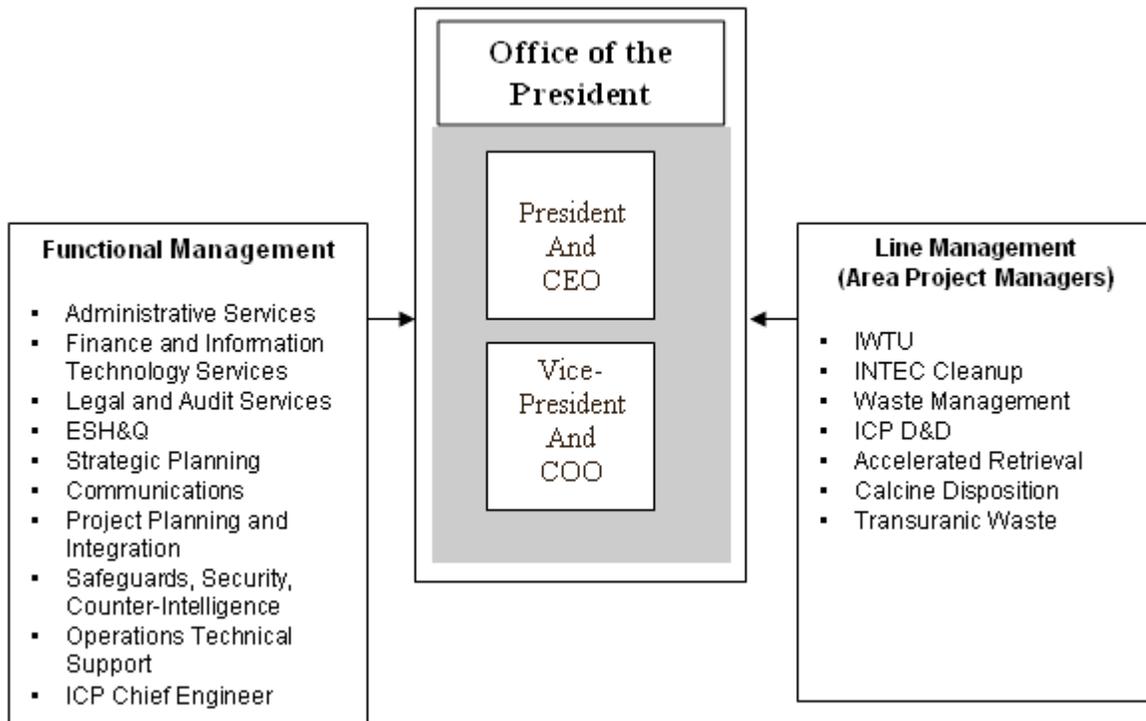


Figure 1. Representative CWI management structure

2.2 INL Site Services

In the performance of the CWI contract, there are technical and administrative services that are more effectively obtained from the other INL site contractors; in particular, Battelle Energy Alliance, LLC (BEA) and Bechtel BWXT Idaho, LLC (BBWI). Services from BEA or BBWI are obtained following CWI subcontracting processes through a Blanket Master Agreement and Master Purchase Order, respectively. As the BEA and BBWI contracts with DOE require that work be performed under a DOE approved Integrated Safety Management System (ISMS) and 10 CFR 851 Programs, specific requirements roll-down was not included in the respective subcontracting documents because each party will be working to the requirements of its own Prime Contract with DOE.

2.3 Miscellaneous Services

CWI and BEA manage and sell to each other various miscellaneous services on an as-needed basis.

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3. LINE MANAGEMENT STRUCTURE AND RESPONSIBILITIES

The CWI line management structure consists of the CWI president and chief executive officer (CEO), the executive vice president and chief operating officer (COO), area project managers (APMs), directors/project managers (D/PMs), and operations management (OM). OM includes department managers (DMs), nuclear facility managers (NFM), nuclear facility managers (NFM), facility managers (FMs), building managers (BMs), and other similar titles. Figure 2 depicts the line management structure.

The following discussion of positions and roles and responsibilities is not prescriptive. Assignment of job responsibilities and roles in a different manner can be accommodated if roles and responsibilities are specifically assigned in writing. The objective is that all responsibilities listed in the following sections are accomplished within senior management and each Area Project as applicable.

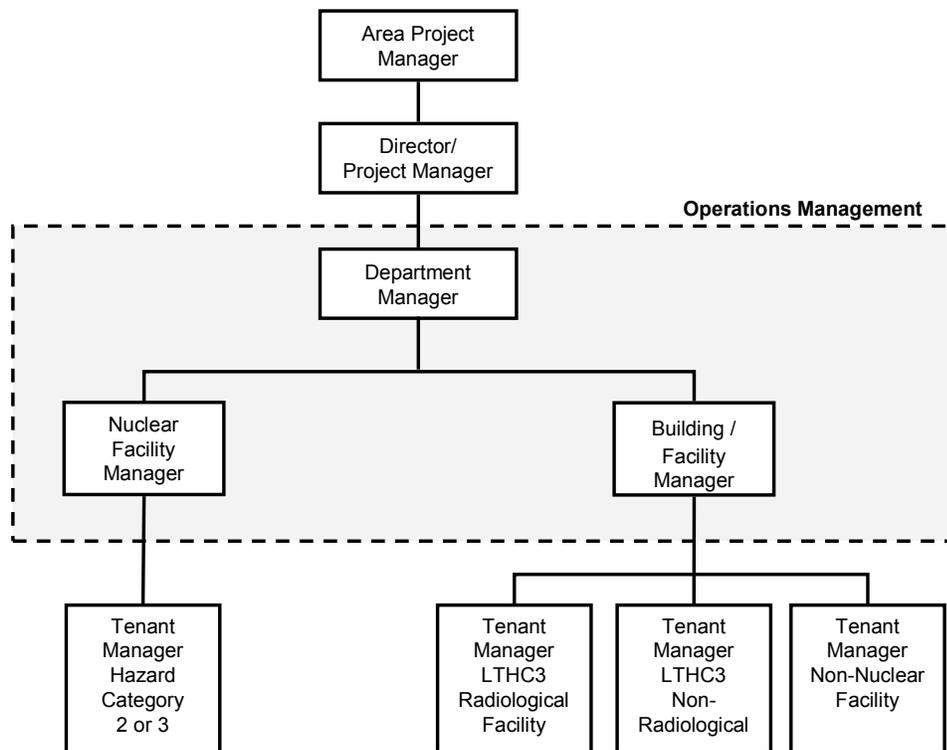


Figure 2. Representative model of CWI’s line management structure including operations management with tenant relationships.

Note: LTHC3 is Less Than Hazard Category 3

3.1 CWI President and Chief Executive Officer (CEO)

The CWI president and CEO provides overall leadership and direction. The CEO sets the mission, vision, direction, and strategy that create a cost-effective accomplishment of the scope of work. The CEO obtains the funding, manages the execution of ICP work within the defined cost, scope, and schedule by ensuring the development of the integrated work schedule, and is ultimately responsible for the safe completion of work. The CEO maintains strategic relationships with the governor's office, congressional staff, regulatory agencies and oversight organizations, and with tribal nations, stakeholders, and the public.

3.2 CWI Executive Vice President and Chief Operating Officer (COO)

The CWI executive vice president and COO provides leadership, direction, and business strategy to implement safe cleanup and closure of designated facilities by managing risks, minimizing costs, and maximizing benefits. Some of the principal responsibilities of the COO include leading the CWI senior management team; interfacing with DOE-ID to develop project schedules, obtaining budget approval, identifying milestones and project-related performance measures; and implementing applicable laws, regulations, and contractual requirements.

The COO focuses on consistent excellence in operations of all project areas. Some functional areas as described in Section 2.1 may report directly to the COO to ensure consistency in processes and controls across the ICP.

Additional COO responsibilities include:

- Ensure consistent field implementation of the Safety Management Programs (SMPs) and other operations-related programs to support a strong ISMS culture.
- Lead or support teams and initiatives across the DOE complex to improve efficiencies and share lessons learned
- Approve alternate implementation methods for company-level requirements when recommended by the affected APM, RM, or cognizant FSMs (see MCP-2447, "Requirements Management").

3.3 Area Project Managers (APM)

An Area Project Manager is assigned to each of the ICP projects. APMs are responsible for defining the scope, establishing project priorities, and requesting the funding to accomplish the project in a safe, secure, cost effective, and compliant manner. APMs ensure proper implementation of the Integrated Safety Management Program (ISMS), the Environmental Management System (EMS),

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the requirements of the Voluntary Protection Program (VPP), other applicable regulations and requirements, and appropriate standards. They also ensure facilities are operated safely and in compliance with the requirements of Authorization Bases, Permits, Consent Orders, and other facility safety documents.

Additional APM responsibilities include:

As core members of the CWI executive team, maintain effective communications and working relationships with the president and CEO, the COO, functional area vice-presidents and directors, responsible managers (RMs), other D/PMs, their own OM, appropriate FSMs and subject matter experts (SMEs), and DOE-ID counterparts

Safely and compliantly complete project activities within the project scope, schedule, and budget

Ensure consideration for ESH&Q resource needs when establishing or changing project funding

Implement the five core functions and eight guiding principles of ISMS as described in PDD-1004, "ISMS Description Document"

Act as project safety champions encouraging worker involvement

Recommend to the COO alternate implementation methods for company-level requirements with concurrence from the cognizant RM and FSM.

Ensure excellence in project team communication

Implement the ICP Nuclear Safety Management Program for compliance with DOE requirements contained in Code of Federal Regulations (CFR), Title 10, "Energy," Parts 820, "Procedure Rules for DOE Nuclear Facilities," 830, "Nuclear Safety Management," and 835, "Occupational Radiation Program"

Provide the single point of contact and accountability to management and customers

Establish and maintain detailed work plans and the Life Cycle Baseline

Develop integrated schedules to accomplish the work according to project priorities and resolve priority conflicts between subprojects

Ensure execution of work including that of subcontractors scheduled in facility plans of the week (POWs) and plans of the day (PODs)

Ensure that commitments related to subprojects and other projects are maintained and communicated regularly

Support partnership with tribal nations, stakeholders, and the public

Support the ICP regulatory strategy with regulatory agencies and oversight organizations

Provide effective participation on corrective action review boards (CARBs) and as low as reasonably achievable (ALARA) committees

Obtain and integrate feedback from employees concerning quality, health, safety, and environmental issues into facility and company lessons learned

Identify and supervise a project manager for each lower-tier subproject within the area project scope

Ensure that employees under their direction are trained and qualified to perform their jobs safely and efficiently

Ensure any construction activity or subcontracted activity executed by non-facility personnel, has defined roles and responsibilities and receives oversight from line management

Develop and implement an area assessment plan to evaluate implementation of programs appropriate to the area project

Maintain high ethical standards and expectations, and demonstrate corporate citizenship in the community

Utilize appropriate project metrics to monitor, evaluate, and improve area project performance.

3.4 Director/Project Manager (D/PM)

D/PMs support APMs, and provide leadership, direction, and integration for projects and subprojects assigned to the area projects (see Figure 1). The responsibilities of D/PMs are the same as for APMs (see Section 3.2.1), but apply only to the assigned project or subproject. Other large, line item or capital projects may also be assigned to report directly to the Office of the President. Details will be specified in individual organization documents and announcements. All responsibilities assigned to the APM in section 3.3 apply to these D/PMs as well.

3.5 Operations Management (OM)

OM implements the CWI goals and expectations for achieving safe, compliant, and efficient operations. OM encompasses titles such as Nuclear Facility Manager (NFM), Building/Facility Manager (B/FM), Operations Manager, Supervisor, Foreman, and others who have line management responsibilities. OM is responsible for ensuring that work is performed safely by implementing and ensuring operations are conducted within Company and facility requirements (such as safety basis, DOE rules and regulations, and environmental regulations and permits) in their respective organizations and facilities.

Some functional areas shown in Figure 1 have responsibilities assigned to them such as warehousing or dosimetry and bioassay, which require attributes of OM to be implemented using a tailored approach as specified in the functional area organizational documents.

As shown in the representative depiction of the CWI OM structure in Figure 2, NFMs are assigned to Category 2 or 3 nuclear facilities (as defined in DOE-STD-1027-92, “Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports.”) B/FMs are assigned to less than Hazard Category 3 (LTHC3) radiological facilities, LTHC3 non-radiological facilities or non-nuclear facilities in accordance with qualifications specified in STD-1109, “Nuclear Facility Manager, Building/Facility Manager Qualification.” A deputy director, project manager, additional OM, and facility tenant managers may be assigned as necessary.

Principal responsibilities of the OM organization include:

Ensure work is performed safely within the assigned area of responsibility

Ensure operational work is directed through the appropriate organizations to accomplish the work safely

Execute assessment programs for implementation of appropriate facility/area programs such as operations, maintenance, radiological controls, engineering, and construction. List (LST-1), “Responsible Managers, Functional Support Managers, and Subject Matter Experts,” contains a complete listing of functional support areas (FSAs).

Implement ISMS in accordance with PDD-1004.

Implement additional programs such as SMPs, VPP, Integrated Safety and Safeguards Management (ISSM), the Quality Assurance (QA) Program, EMS, conduct of operations, and conduct of maintenance

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Ensure that operations are conducted in compliance with facility requirements such as the authorization basis, contract-required DOE directives, and environmental regulations and permits

Designate a qualified individual in nuclear facilities to act in the absence of Operations management for individuals that are required to maintain qualification for their respective position (i.e. NFM and shift supervisor)

For each nuclear facility, establish minimum general staffing requirements consistent with the facility's document safety analysis, taking into consideration appropriate restriction of time on duty, to be present in the control area for different operating conditions for each ICP facility, etc.

Approve STD-101, "ICP Integrated Work Control Process" or MCP-3562, "Hazard Identification, Analysis, and Control of Operational Activities" work documents (Maintenance management approves STD-101 maintenance work documents. Operations and Construction management approve STD-101 construction work documents. Operations facility management approves MCP-3562 work documents.)

Authorize activity/work documents through the plan of the week (POW), plan of the day (POD), or similar process (Operations management—department level or higher—authorizes POW/POD.)

Release activity or start-of-work (Operations management or Tenant line management performs start work release each time the activity/work document is performed—except STD-101 Request Exempt Minor Work)

Chair facility-level CARBs and ALARA committees as appropriate

Ensure that critiques or investigations are held for unusual events and near misses so that feedback is given to workers and lessons learned are captured

Identify resource needs, and obtain and manage resources to accomplish project milestones and objectives

Interface with matrixed and deployed functional managers to improve processes through application of lessons learned and feedback

Ensure that organization-specific training requirements are defined and implemented for each employee

Establish organization-specific training procedures

Provide direction to other line managers for training objectives

Approve organization-specific training plans

Coordinate the development of an effective training process

Ensure that all employees within the operations organization are trained and qualified to perform their jobs safely and efficiently

Participate in integration discussions and activities—as an OM team effort—to enhance the effectiveness of the organizational structures and processes in support of ICP goals

Implement an assessment process, including the Contractor Assurance System

Obtain feedback from employees concerning quality, health, safety, and environmental issues and incorporate into appropriate company and facility lessons learned.

3.5.1 Nuclear Facility Managers (NFM)

NFMs are OM and are assigned the responsibility for equipment, structures, activities, processes, and personnel in one or more assigned nuclear facilities. NFMs are assigned in accordance with the requirements in MCP-2446, “Controlling Lists of ICP Nuclear Facilities and Nuclear Facility Managers.” The qualification program for NFMs is defined in STD-1109. The NFM is responsible for:

- Developing and maintaining the authorization basis
- Overseeing the authorization of work in assigned facilities and ensure that operations work release properly accounts for equipment status and safety basis requirements
- Maintaining compliance with the authorization basis documents, both safety basis and environmental permits
- Effectively implement the unreviewed safety question (USQ) process for assigned facility
- Ensuring that facility programs, especially those designated as SMPs, are effectively implemented
- Ensuring that equipment, especially those designated as safety class or safety significant, are properly maintained and stused
- Ensuring personnel assigned responsibility for command, control and execution are properly trained and qualified.

3.5.2 Building/Facility Managers (B/FM)

B/FMs are OM and are assigned the responsibility for equipment and structures in one or more buildings classified as Less Than Hazard Category 3 (LTHC3) radiological and non-radiological facilities as well as non-nuclear facilities. B/FMs are qualified in accordance with STD-1109.

B/FMs have responsibilities similar to those of an NFM but a tailored-approach is used since the facility hazards are reduced.

3.5.3 Management-Tenant Relationships and Responsibilities

To ensure that line management responsibility for safety is clearly defined throughout CWI organizations, the line management structure is defined to the tenant level. Some OM personnel are responsible for buildings and facilities that house other technical, analytical, and support staff performing tenant work. The organizations residing in the buildings are considered tenants of the facilities. The tenant owns and maintains the physical assets inside the tenant's physical area of ownership.

MCP-9141, "Tenant Use Agreements," establishes the tenant use agreement (TUA) process between OM and tenant organizations. The procedure applies to facilities that have tenants who perform activities, processes, or operations with hazardous materials, but do not have a defined safety envelope such as a documented safety analysis or hazard assessment document covering the tenant activities. The agreements are updated during new hazards identification processes, management document changes, or annually, as appropriate. The TUA process is used to define responsibilities when the management is CWI and the tenant is BEA or vice versa. In addition to tenant use agreements, interface agreements (IAGs) and memorandums of understanding (MOUs) can be used to define management-tenant relationships and responsibilities.

OM responsibilities include:

- Manage and maintain assigned buildings and grounds
- Concur with changes in tenant operations or configurations that could adversely affect other building tenants, the facility configuration, or the facility safety basis
- Ensure that work is performed within the scope of the tenant's operation as defined in the tenant use agreement (TUA), and retains

the authority to terminate unsafe work or work outside of that defined in the TUA.

Tenant responsibilities include:

- Support advance planning processes such as the POW process so that resources can be properly allocated and work prioritized
- Place day-to-day activities in the facility POD, and operations authorization is given with approval of the POD by OM. A release to work must be obtained from the designated OM to ensure that both operations staff and the tenant are cognizant of facility conditions and equipment status.
- Perform activities within the physical area of ownership and to the scope defined in the TUA, MOU, or IAG
- Ensure day-to-day physical and operational security for areas of ownership
- Advise OM of planned changes that affect the basic nature of occupancy in the building
- Advise OM of any upcoming or proposed tenant activity changes that could affect safety documents, such as Hazard Analysis Documents or Facility Hazards Lists, or adversely affect the building function.

3.5.4 Senior Supervisory Watch (SSW) Process

The SSW may be assigned by the senior line manager as part of a normal process, or as a compensatory action, as a roving or task specific watch within a facility or area to assess work activities. The SSW should normally be a senior line manager representative in the field to provide experienced and mature oversight of facility operations. Stationing the SSW does not relieve line management from their responsibilities for operations and safety.

Stationing the SSW is at the discretion of the senior line manager and is not intended to replace routine management observation of departmental work or assessments, nor should it be used for routine low risk activities. The following are examples of when usage of the SSW may be warranted:

- High risk maintenance activities

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- First time evolutions of a complex activity
- Repeat or similar problems occurring with a specific activity
- Nonroutine confined space entries
- Activities determined as highly hazardous per MCP-3562, “Hazard Identification, Analysis, and Control of Operational Activities”
- Any special evolution requiring the transport of radioactive materials, asbestos-bearing items, or transportation of unusually large objects, including those being transported via railroad.

Selection of the SSW should be based on experience and ability to recognize issues that should be investigated or receive follow-up as determined by the responsible line manager. The qualification as a minimum should include:

- General knowledge of safety basis documents
- General technical knowledge of activities being observed.

The SSW’s key responsibility is to provide an independent overview of the work control process including hazard identification and mitigation, job walk downs, safety integration, prejob briefing adequacy, lockout/tagout usage, use of procedures, and job safety performance. The SSW ensures identified deficiencies are being properly addressed and findings are reported to the senior line manager. The SSW should provide the senior line manager with a written assessment report of the assigned activities.

The SSW should stop any evolution in progress that causes concern, identify the concern to line management, concur with resolution of the concern, and allow resumption of the evolution after satisfactory resolution. The senior line manager should be informed of any concerns that are not satisfactorily resolved. The following are additional examples of expected responsibilities. Actual responsibilities should be tailored to the needs of the particular area.

- Review lockout/tagout activities routinely during each SSW assignment.
- Review work documentation for deficiencies, especially in the area of the hazard mitigation of the planned activity and operations authorization.

- Observe communications, feedback, and continuous improvement activities (i.e., prejob and postjob briefings) and provide suggestions for improvement for effective communications regarding work scope clarity, hazard identification, mitigation, and “person-in-charge.”
- Ensure any nonroutine activities that release wastewater or discharge other liquids are controlled per environmental requirements. At a minimum, review the work documents for the activity to ensure the environmental requirements have been included in the planning for the evolution.
- Spot-check surveillance activities that support safety analysis report requirements.

3.6 Coordination of Responsibilities between Area Project Managers

Because some CWI area projects may perform work within the boundary of a facility operated by another area project organization, line management responsibility for safety must be clearly defined. In general, the line management responsibility for safety will run through the management chain in which work authorization resides. IAGs or Project Execution Plans (PEPs) will be utilized when TUAs are not considered appropriate. As a minimum, the IAGs or PEPs will cover programmatic responsibility for work authorization and execution, emergency preparedness, notification and reporting, engineering, and document control. Illustrative examples of possible relationships are given in Appendix A.

3.7 Project Functional Organizations

Functional personnel can either be “deployed” or “matrixed” to a project as shown in Figure 3.

When functional personnel are deployed to a project, they are part of the line management organization, and report directly to line management. They direct day-to-day work of other deployed functional personnel, as specified in organizational documents, to support achievement of line management objectives. Deployed functional personnel work in areas such as radiological controls, engineering, and maintenance.

When functional personnel are matrixed to a project they report directly to their functional area management, and may also report to line management in support of project work. They are responsible for implementing functional system requirements, in a support role, for their assigned organizations. Matrixed functional personnel work in areas such as quality assurance, environmental management, and project controls. They may direct the day-to-day work of

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matrixed functional employees, as specified in organizational documents, to support project managers.

The responsibilities of both deployed and matrixed functional personnel include:

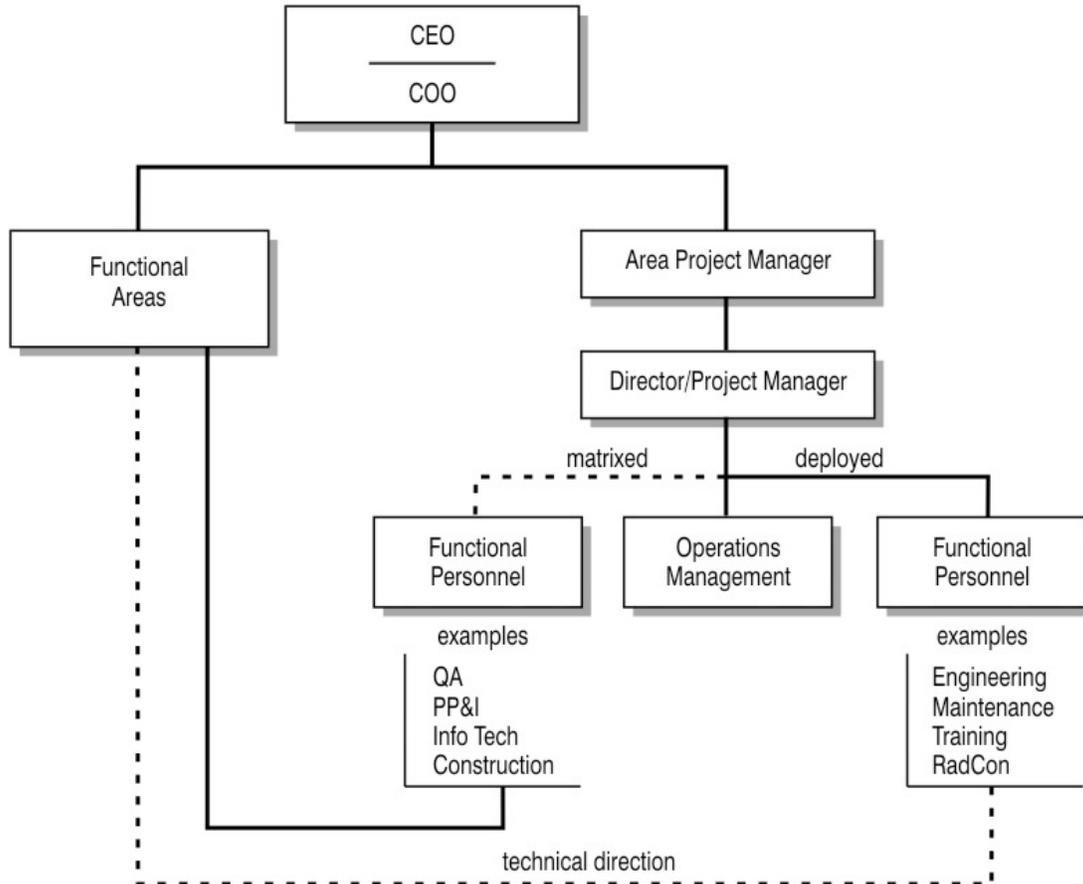
Interface with their own FSM on lessons learned, process initiatives, and technical difficulties

Implement the training and qualification process required by the FSA for functional personnel

Participate in the assessment process to ensure effective implementation

Implement companywide procedures in their respective FSA

Verify that adequate resources are available and provided to accomplish work scope.



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Figure 3. Representative diagram showing reporting relationships of matrixed and deployed functional personnel.

4. FUNCTIONAL MANAGEMENT STRUCTURE AND RESPONSIBILITIES

The CWI functional management structure consists of lead areas, functional support areas and organizations, RMs, FSMs, and Subject Matter Experts (SMEs) as listed in LST-1, and includes both matrix and deployed personnel. RMs, FSMs, and SMEs work closely together to ensure that implementation of standards and requirements are consistent companywide. The Office of the President, and in particular the COO have significant functional responsibilities (see Sections 3.1 and 3.2).

The following discussion of positions and roles and responsibilities is not prescriptive. Assignment of job responsibilities and roles in a different manner can be accommodated if roles and responsibilities are specifically assigned in writing. The objective is that responsibilities listed in the following sections are accomplished within each FSA as applicable.

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RMs provide leadership, direction, and integration for the FSAs assigned to their lead area as shown on LST-1. Specific external standards and requirements are assigned to each lead area and to specific company manuals. Examples of lead areas (from LST-1) are: Administrative Services; Chief Engineer; ESH&Q; Finance and Information Technology Services; Operations Technical Support; Project Planning and Integration; Waste Management; and Safeguards, Security and Counterintelligence.

Some specific activities assigned to lead areas such as warehousing or dosimetry and bioassay operations, require the attributes of OM as listed in Section 3.5. Attributes to be implemented should be included on organizational documents.

The role of the RM is to ensure that any assigned program meets external standards and requirements; protects workers, the public, and the environment; and adequately addresses other vulnerabilities (e.g., financial, legal, or security). RMs also ensure implementation of standards and requirements at the company level as described in MCP-2447, “Requirements Management.”

Principal responsibilities common to all RMs include:

- Define and serve as ultimate site authority for applicable requirements for their lead area
- Approve any changes affecting the composition of lead areas such as transfer of FSAs, creation of new lead areas affecting the RM’s lead area, or other such changes.
- Approve changes in assignment of FSAs to or from their lead area
- Concur in appointments of FSMs and SMEs within assigned lead area(s)
- Ensure effective and consistent implementation of functional programs across CWI
- Concur, in writing, with an alternative implementation method of a company-level process that is proposed by a specific project and concurred with the cognizant FSM
- Establish programs to allow personnel to perform in their lead area
- Establish and maintain effective systems, policies, and procedures in the assigned lead area
- Ensure that commitments related to ICP projects are maintained and the status of the commitments is communicated regularly to employees
- Promote a positive, collaborative work environment

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- Interface with OM to improve processes through application of lessons learned and feedback
- Obtain and integrate feedback from lead area personnel
- Ensure that employees under their direction are trained and qualified to perform their jobs safely and efficiently
- Develop and implement a programmatic assessment plan to evaluate implementation of program elements in accordance with MCP-9172, “Developing, Integrating, and Implementing Assessment Plans and Schedules.”
- Provide leadership and support to DOE complex-wide teams and initiatives to improve efficiencies and share lessons learned
- Establish a work culture consistent with the ICP mission, vision, and values including supporting strategic relationships with regulatory agencies, oversight organizations, tribal nations, and the public
- Meet CWI performance objectives
- Manage compliance with other lead area programs and organizations.

4.1 Functional Support Manager Roles and Responsibilities

A comprehensive list of FSMs is contained in LST-1. Responsibilities of FSMs include:

Ensure that every applicable requirement is implemented in an appropriate implementing document. In the rare case in which a requirement is applicable to only one project, ensure appropriate implementation in that project

Act as final authority for interpretation and applicability of their program requirements to line management

Assist line management and concur in recommending to the RM an alternative implementation method of a company-level process

Estimate funding and resources necessary to implement new or revised requirements

Assign functional staff to projects, as necessary, as matrixed functional personnel (see Figure 3) with concurrence of line management

Designate personnel to serve as SMEs, where required.

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Concur with SME interpretations before submittal for final approval to RM and line management

Assist SMEs, as necessary, to fulfill responsibilities

- Establish and implement the discipline-specific technical attributes and training expectations for the training and qualifying of affected personnel
- Ensure that the quality of standard equipment, hardware, software, and documentation that is under the direct purview of the function meets company and facility requirements, such as PAAA
- Maintain open lines of communication with line management and with customers such as DOE
- Implement ISMS, VPP, ISSM, and EMS in the relevant functional support area
- Develop a programmatic assessment plan to evaluate implementation of program elements. The FSM is responsible to verify that FSA requirements have been adequately implemented across CWI through these sampling assessments.
- Perform annual ISMS maintenance assessments and provide input to the ISMS annual report

4.2 Subject-Matter Expert Roles and Responsibilities

A comprehensive list of all company-level SMEs is contained in LST-1.

Responsibilities of SMEs include:

General

- Maintain effective communication and working relationships with facility line management and other SMEs
- Interface with facilities, projects, and other support organizations to ensure that the quality of standard equipment, hardware, software, and documentation meets site and facility requirements
- Establish and maintain effective relationships and coordination of ICP interfaces with regulators and oversight organizations.

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Requirements Management

- Advise FSMs and line management regarding interpretation and applicability of requirements
- Maintain proficient knowledge of assigned FSA requirements
- Identify and interpret requirements in assigned laws and regulations, DOE directives (List B), contract clauses and language, and other contractual language as they apply to current contract work scope
- Develop and submit documentation for implementation of the requirements of assigned FSA(s)
- Perform applicability reviews on new and revised requirements documents proposed for addition to the CWI contract, including identification of costs, impacts, and implementation schedules and strategies
- Complete all actions necessary to demonstrate compliance with requirements implementation through requirements rolldown.

Training

- Identify and develop the training and qualifications programs to ensure that requirements are implemented effectively and employees are trained and qualified to perform work safely
- Monitor the completion of the required training as reported by line management.

Assessment

- Work with RMs and FSMs to develop a FSA programmatic assessment plan to evaluate implementation of program elements. This includes identifying and defining the company-level required assessments, and providing assessment criteria and attributes for conducting these assessments
- Participate in project evaluation boards, operational readiness reviews, readiness assessments, management assessments, or other assessments and reviews, as requested.

Feedback and Improvement

- Work to ensure continuous improvement in the assigned FSA
- Be familiar with project events and issues, assisting line management in developing corrective plans and lessons learned.

Nuclear Safety

Participate in Safety Analysis Report (SAR)-100, “ICP Standardized Safety Analysis Report (SAR) Chapters,” and Technical Safety Requirement (TSR) - 100, “ICP Standardized Technical Safety Requirements (TSR) Document,” for nuclear safety implementation activities.

4.3 Functional Support Area Personnel Deployed or Matrixed to Projects

Deployed personnel from FSAs such as engineering, training, maintenance, and radiological controls include functionally-trained personnel who report directly to line management within area project organizations. Line management responsibility for deployed FSA personnel is identical to their responsibility for all other personnel within the line organization. FSA management provides technical guidance, career development, and approves training for deployed FSA personnel. FSA management provides input to line management for deployed FSA personnel performance evaluations, pay increases, and job rotation.

Matrixed personnel from FSAs such as Quality Assurance, Project Planning, and Integration, Construction, Human Resources, Nuclear Safety, Packaging and Transportation, Procurement, and Financial Operations, include functionally-trained personnel who report directly to their FSA management, but provide support to APM organizations as requested. In this case, line management is a “customer” of FSA management. While line management may provide direction to these matrixed personnel, FSA management is accountable to line management for the accomplishment of FSA scope within the requiring organization. Line management provides input to FSA management for performance evaluations and job rotations.

5. LINE AND FUNCTIONAL ORGANIZATION INTERFACE

Due to the unique skills required of functional area personnel and their frequent assignment to line organizations for work accomplishment, interface protocols must be established between line and functional management.

The following two tables describe the interfaces. Attributes are annotated as “deployed” or “matrix” if the attribute is affected by the manner in which functional personnel are assigned. If there is no annotation, the attribute applies to all functional personnel regardless of how they are assigned.

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Table 1. Safety, quality and budget functions of functional and line management.

Function	Functional Management	Line Management
Safety	<ul style="list-style-type: none"> • Provides any function-specific training • Monitors performance indicators for function and takes appropriate action (matrix) • Supports implementation of and encourages employee involvement in the VPP, and project safety programs (matrix) • Supports initial safety training, including: <ul style="list-style-type: none"> - General Employee Radiological Training (GERT) - Site orientation - Safety and health access • Defines and interprets site-consistent standards for CWI. 	<ul style="list-style-type: none"> • Provides project-specific training • Ensures a safe work environment • Provides project-specific safety awareness • Monitors safety statistics for the project and takes appropriate action • Implements the safety program including project-specific programs • Implements ISMS and VPP • Implements work restrictions • Completes accident/incident reports • Implements applicable corrective actions.
Quality	<ul style="list-style-type: none"> • Ensures and verifies that discipline-specific work is executed in accordance with applicable procedures, codes, and standards (matrix) • Supports line management to ensure that products and services meet applicable quality requirements. 	<ul style="list-style-type: none"> • Ensures that work products are produced in accordance with company, area, or facility programs and program-specific requirements such as the authorization and safety bases • Develops and maintains appropriate area, facility, and program-level implementing procedures and provides necessary training • Ensures implementation of the Site quality program through inspection, assessment, and surveillance feedback

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Function	Functional Management	Line Management
Budget	<ul style="list-style-type: none"> Provides budget and funding for function overhead activities (matrix) Provides function-wide staffing forecasting based on input from line organizations. 	<ul style="list-style-type: none"> Provides budget and funding for direct work activities Provides project-specific staffing forecasting Provides office supplies, copy services, office space and furniture, and computer hardware and software in support of project-specific activities and requirements Provides budget and funding for travel and training in support of project activities and requirements Provides budget and funding for Site-level meetings required to support direct work assignments Provides reasonable accommodations for ergonomic problems.

Table 2. Functional and line management personnel typical responsibilities.

Activity	Functional Management	Line Management
Employee assignments	<ul style="list-style-type: none"> Assigns employees to line organizations based on requirements received from line organization and skills of personnel (matrix) Obtains concurrence from line organization in assignment or reassignments of employees (matrix) In cases of disagreement concerning employee assignments, resolves, with additional management involvement, if needed (matrix) Maintains the staffing levels and skill mixes required by the line organization either from current employees, by hiring new employees, or by subcontracting (matrix) Addresses performance problems identified by the line organization and obtains line organization concurrence on their resolution. (matrix) 	<ul style="list-style-type: none"> Identifies and communicates staffing requirements to functional organization, providing advanced notice through planning (matrix) Concurs with assignment or reassignment of employees from functional organization (matrix) In cases of disagreement with employee assignments, participates, with the functional organization, to resolve differences (matrix) May need to move employees between project assignments in the same project organization and employees can be temporarily loaned to other projects with notice to the functional organization (matrix)

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Table 2. (continued).

Activity	Functional Management	Line Management
		<ul style="list-style-type: none"> • Releases, with proper advanced notice through planning and communication, employees at task completion for reassignment by functional organization (matrix) • Identifies and documents performance problems to functional organization assists functional organization in their resolution, and concurs with the resolution (matrix) • Determines depending on the circumstances and with functional management input, whether the work will be performed by company staff or subcontracted labor or services.
Time cards	<ul style="list-style-type: none"> • Provides any department-specific timesheet training if required • Approves timesheets (matrix) • Approves personal leave. (matrix) 	<ul style="list-style-type: none"> • Approves timesheets (deployed) • Approves work schedules • Approves use of personal leave (deployed) • Provides training on work packages and appropriate charge codes.
Career development/ promotions	<ul style="list-style-type: none"> • Establishes guidelines for career advancement within a department or discipline • Establishes core-competency expectations for discipline work at specific salary grade levels • Reviews career plans with input from employees • Prepares promotion plans and approves promotions for direct reports and matrixed personnel. Provides input on promotion plans for deployed personnel. • Discusses promotion opportunities with the line organization and resolves disputes. In cases of disagreement, resolves with additional management involvement, if needed 	<ul style="list-style-type: none"> • Provides work opportunities in accordance with career-development guidelines (deployed) • Recommends candidates for promotion (matrixed) • Concurs with promotion plans for matrixed personnel and, in cases of disagreement, participates with functional management to resolve differences • Develop and implement promotion plans for direct reports and deployed personnel. • Supports job-rotation opportunities • Provides project- or program-specific required training and tuition

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Table 2. (continued).

Activity	Functional Management	Line Management
	<ul style="list-style-type: none"> • Identifies and ensures availability of discipline core training • Supports career-enhancement training and career-development opportunities: technical paper presentations, industry committee participation, and professional registration or certification within limitations of budgets and priorities • Provides job-rotation opportunities with concurrence of the line organization • Mentors employees in their professional development. 	reimbursement <ul style="list-style-type: none"> • Supports technical paper presentations when justified by the line organization.
Work assignments	<ul style="list-style-type: none"> • Develops functional execution procedures and guidelines • Provides discipline-specific requirements for work execution • Develops work process improvements • Maintains and improves discipline-specific core competency for employees • Conducts function-specific assessments • Ensures that employees are performing at grade level and within competency • Identifies the need for future competencies based on input from the line organizations and develops a strategy to obtain them (matrix) • Participates in the work planning process to ensure that appropriate skill sets have been identified for the work scope (matrix) • Maintains position descriptions (PDs) for its employees (matrix) 	<ul style="list-style-type: none"> • Provides day-to-day direction and work assignments • Establishes schedules for completion of work assignments • Provides area- or project-specific requirements for work execution • Supports department work process improvements through participation on quality improvement teams • Concurs with work process improvements proposed by the functional area before being implemented within the specific line organization • Supports functional area initiatives to improve core competency through identification-of-needs work assignment opportunities and subcontracting strategies • Reports on the status of work such as area or project milestones, deliverables, and award fee items • Maintain PDs for all employees. (deployed)

6. ORGANIZATION MANAGEMENT EXPECTATIONS

CWI line management, as outlined in Figure 1, is directly responsible for ensuring that work is performed safely, in accordance with ISMS Guiding Principle 1, “Line Management is Responsible for Safety.” This document, in conjunction with project-specific roles and responsibilities documents, provides clear and unambiguous lines of authority and defines the responsibility for ensuring that safety is established and maintained at all organizational levels, in accordance with ISMS Guiding Principle 2, “Clear Roles and Responsibilities.”

Line and functional management work to similar expectations when carrying out roles and responsibilities listed in this document. Each has roles in integrating key ISMS functions and processes, and implementing the VPP and Environmental Management System (EMS) to perform quality work safely, securely, environmentally responsibly, and efficiently. This section discusses expectations for organizational management described in this document while carrying out their roles and responsibilities.

6.1 Safety Expectations

Management will ensure that project safety expectations are implemented by:

- establishing safety as an organizational value and a prerequisite for all work.
- establishing a safe work environment. Through processes such as assessment, worker feedback, and personal observation, ensure that a safe work environment is established and maintained.
- taking pre-emptive actions in response to degrading conditions. While prompt response to adverse occurrences and conditions is expected, management will ensure that processes such as critical assessment, performance metrics collection, and direct field observation of processes in progress, are available to aid in forming and executing pre-emptive actions.
- utilizing response to adverse events for overall performance improvement. The emphasis in this response will be on accurately determining causes, then properly responding, including response to underlying causes in management system and processes. Management must ensure that adequate extent of conditions considerations are utilized to preclude similar events elsewhere in the organization. Similarly, evaluation of information obtained from adverse events occurring in other organizations is required to preclude similar events.

6.2 Work Performance Expectations

Management will achieve project work performance expectations by:

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- controlling work to meet ISMS and safety expectations, utilizing processes such as those described in PDD-1004. ISMS Guiding Principle 7, “Operations Authorization,” is applicable to the performance of any work, whether performed by line or functional personnel, as described in Sections 3 and 4.
- utilizing a POW/POD process, or equivalent, ensure that priorities are balanced in accordance with ISMS Guiding Principle 4, “Balanced Priorities” and will ensure that competent personnel are available to perform the work in accordance with ISMS Guiding Principle 3, “Competence Commensurate with Responsibilities”.
- ensuring that work is performed in accordance with procedures, or the work will be stopped until the procedure can be corrected. “Thinking compliance” is the standard so that blindly following a procedure does not lead to adverse events.
- Management, most often OM as defined in Section 3.5, must ensure that adequate oversight is provided to high-risk, complex, or first-time work, utilizing processes such as hazard review boards, senior supervisory watch, management field visits, surveillances, or observations.

6.3 Organizational Management Attributes

The impact of management behavior on organizational performance is extensive. The following behaviors are critical to organizational success:

- Demonstrating a self-critical approach
- Demonstrating a questioning attitude
- Demonstrating ownership of requirements implementation
- Demonstrating insistence on high standards
- Utilizing employee recognition programs to increase desired behaviors
- Actively sponsoring of teamwork
- Seeking out and acting on worker feedback
- Providing vision and direction.

7. SUMMARY

The history of ICP is steeped in accomplishments and advances attained by a work force of skilled, hardworking, dedicated employees. Our future as individual employees and of

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the entire Site is wholly dependent on our ability to work safely and efficiently. This document addresses the necessity of integrating conduct of operations, conduct of maintenance, ISMS, VPP, ISSM, EMS, and other programs with processes and policies effectively implemented at the worker level. The overarching element is integration of factors that contribute to the safe and efficient completion of quality work.

All employees must remain mindful that an organization is no more or less than its people. CWI expects all employees to keep their own safety and that of their coworkers, the public, and the environment uppermost in their minds as they continue to contribute to the ICP's success.

8. REFERENCES

Title 10 Code of Federal Regulations (CFR), "Energy," Part 820, "Procedural Rules for DOE Nuclear Facilities," *Code of Federal Regulations*, Office of the Federal Register.

10 CFR 830, "Nuclear Safety Management," *Code of Federal Regulations*, Office of the Federal Register.

10 CFR 835, "Occupational Radiation Program," *Code of Federal Regulations*, Office of the Federal Register.

10 CFR 851, "Worker Safety and Health Program," *Code of Federal Regulations*, Office of the Federal Register.

DOE Guide 450.4-1C, "Integrated Safety Management System Guide," September 29, 2011.

DOE-STD-1027-92, "Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports."

LST-1, "Responsible Managers, Functional Support Managers and Subject Matter Experts."

MCP-2446, "Controlling Lists of ICP Nuclear Facilities and Nuclear Facility Managers."

MCP-2447, "Requirements Management."

MCP-3562, "Hazard Identification Analysis and Control of Operational Activities."

MCP-9141, "Tenant Use Agreements."

MCP-9172, "Developing, Integrating, and Implementing Assessment Schedules."

PDD-1004, "Integrated Safety Management System."

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(SAR)-100, “ICP Standardized Safety Analysis Report (SAR) Chapters.”

STD-101, “ICP Integrated Work Control Process.”

STD-1109, “Nuclear Facility Manager, Building/Facility Manager Qualification.”

(TSR) -100, “ICP Standardized Technical Safety Requirements (TSR) Document.”

Appendix A

Examples of Coordination of Responsibilities between Two Area Projects

The following are examples only. Although actual names are used (rather than organization A, and organization B), the example may or may not be the way these organizations interface in actuality.

Example 1: A D&D project is to be performed in the INTEC area by personnel reporting to the TAN/PBF/RTC Area Manager. Because of complex interfaces with ongoing operations, the operations management function remains with the INTEC APM. The interface agreement or PEP will specify:

- Emergency Preparedness will be the responsibility of the INTEC APM
- Scope definition for the project will be done by the TAN/PBF/RTC APM
- Hazard analysis, engineering, configuration management, and document control will be approved by the INTEC APM OM, with input from the TAN/PBF/RTC APM
- Hazard controls and implementation will be developed by the TAN/PBF/RTC APM OM with approval from the INTEC APM OM
- TAN/PBF/RTC APM OM will prepare and submit work instructions, and work package approval, work authorization, and LOTO approvals will be granted by the INTEC APM OM
- All work will be planned through the INTEC APM OM POW/POD process
- Work will be performed by the TAN/PBF/RTC APM organization and may utilize INTEC personnel as agreed
- Assessment of hazards controls implementation and work control performance will be performed as specified in the interface agreement or PEP
- Safety oversight will be provided by both APMs
- Work package feedback will be provided by the TAN/PBF/RTC APM to the INTEC APM OM.

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Example 2. A D&D project is to be performed in INTEC. Because this project can be isolated from other ongoing operations, the OM functions can be formally transferred by interface agreement or PEP to D&D

- Scope definition will be done by the D&D APM OM
- Emergency preparedness will be done by the INTEC APM
- Hazard analysis will be done by the D&D APM OM
- Hazard controls and implementation will be completed by the D&D APM OM
- Work packages will be developed and approved and work authorization will be granted by D&D APM OM
- Assessment of controls and performance will be performed by D&D APM
- ORPS reporting will be the responsibility of the D&D APM
- LCB reporting will be the responsibility of the D&D APM
- INTEC APM provides coordination and integration of the D&D APM project with on-going INTEC work.

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Appendix B

Requirement Basis

Section	Requirement	Source	Citation
3, 4	Establish organizational structures, responsibilities, and interfaces	10CFR830 Subpart B SAR-100	830.203 (a) through (d) Chapter 17
3, 4	Management and the operating contractor establish, implement, and maintain appropriate lines of authority.	SAR-100 TSR-100	AC 5.100.1 Chapter 17
3.5	Establish minimum general staffing requirements	TSR 100	AC 5.100.2
3.3 3.5 3.5.1 4.1	A program will be established, implemented, and maintained for qualification and training of nuclear facilities personnel.	TSR-100	AC 5.100.5