





Department of Energy
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MEMORANDUM FOR: INGRID KOLB
DIRECTOR, OFFICE OF MANAGEMENT

THROUGH: KEVIN T. HAGERTY 
DIRECTOR, OFFICE OF INFORMATION RESOURCES

FROM: MATTHEW B. MOURY 
ASSOCIATE UNDER SECRETARY FOR
ENVIRONMENT, HEALTH, SAFETY AND SECURITY

SUBJECT: Notice of Intent to Revise Department of Energy Integrated Safety
Management Policy 450.4A, Order 450.2, and Guide 450.4-1C

PURPOSE: This memorandum justifies the need to revise Department of Energy (DOE) Integrated Safety Management (ISM) Policy (DOE P 450.4A), Order (DOE O 450.2), and Guide (DOE G 450.4-1C).

This set of directives prescribes the requirements and responsibilities and provides guidance for the Department's ISM system as established in 1996 and maintained through various revisions. This proposed concurrent revision of the ISM Policy, Order, and Guide will allow DOE to:

- Institutionalize actions and lessons learned during the last 4 years, including those generated from the safety culture implementation plan and captured in Secretary and Deputy Secretary memoranda;
- Clarify requirements and responsibilities for maintaining the ISM system and strengthen implementation guidance;
- Ensure that requirements, responsibilities, and guidance in these directives are clearly expressed, not duplicative or in conflict with DOE's other directives, and are effectively implementable alongside the other directives;
- Transfer relevant information from DOE Handbook (HDBK) 3027-99, *Integrated Safety Management Systems (ISMS) Verification, Team Leader's Handbook*, into these directives to provide a consistent framework for ISMS, including the verification process and enhance the effectiveness of DOE's overall ISMS consistent with the concurrent review and revision of the Handbook;
- Enhance mission efficiency by having one cohesive set of ISM directives that reduces the personnel resources required to understand and manage DOE's ISM system, promote complex-wide implementation consistency, and foster the safe performance of work

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(especially at multi-program sites); and

- Implement continuous improvement, which is an essential tenant of ISM and, in this proposal, refers to continuous improvement of the ISM system.

JUSTIFICATION: ISM has served as DOE's overarching framework for safely planning, executing, and monitoring work activities for nearly 20 years and is due for its required 4-year review.

DOE made significant updates to its ISM policy and directives in 2011:

- Consolidated worker safety and health policies under a single ISM umbrella policy;
- Integrated into a single ISM Order safety requirements, roles, responsibilities, and authorities for Federal organizations; and
- Published a single guide that updated and consolidated the large body of implementation guidance developed since the inception of DOE's ISM system.

The proposed revision will continue long-term efforts to streamline ISM requirements and guidance, and include both updates and new content covering:

- Institutionalization of insights and lessons learned from the:
 - Output of the completed implementation plan in response to Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2011-1, *Safety Culture at the Waste Treatment and Immobilization Plant*;
 - Recent focus on safety culture and Safety Conscious Work Environment (SCWE) and the extent of condition review of SCWE across the Department;
 - Extensive information developed through operational experience from field activities; and
 - Organizational changes impacting line management structure, reporting relationships, and delegations of authorities.
- Recently established Safety Culture Improvement Panel's charter and activities. DOE's Safety Culture Improvement Panel's initiatives, including the Panel's ongoing review of the DOE Acquisition Regulations (DEAR) ISM Clause. (Contractor requirements and responsibilities are contained in the ISM DEAR Clause (48 CFR 970.5223-1 - *Integration of environment, safety, and health into work planning and execution*, 1999) and are invoked through contractual arrangements.)

The proposed revisions will seamlessly integrate with the recently provided content in DOE G 226.1-2A, 2014, *Federal Line Management Oversight of Department of Energy Nuclear Facilities*, and HDBK 1211-2014, *Activity-Level Work Planning and Control Implementation*, addressing the activity-level work planning and control and safety culture features of ISM.

IMPACT: The proposed revisions do not duplicate existing laws, regulations, or national standards, and do not create undue burden on the Department. These revisions are essential for continuously improving DOE's safe and efficient performance of work.

Representatives from across DOE Headquarters programs and field elements will perform the review and develop proposed revisions functioning in the same manner as the inclusive team that successfully revised DOE G 226.1-2A, 2014 and developed HDBK 1211-2014 to institutionalize activity-level work planning and control lessons learned.

WRITER: David Weitzman, (301) 903-5401, david.weitzman@hq.doe.gov

OPI/OPI CONTACT: Bill McArthur, PhD, DOE Responsible Manager, Office of Worker Safety and Health Policy, EHSS, (301) 903-9674, bill.mcarthur@hq.doe.gov

Ingrid Kolb, Director, Office of Management (MA-1):

Concur:  Nonconcur: _____ Date: 11-4-15

<u>Standard Schedule for Directives Development</u>	<u>Days</u>
Draft Development	120 60 days
Review and Comment (RevCom)	30 60
Comment Resolution	30
Final Review	30
Total	150