SRS ES&H STANDARDS COMPLIANCE PROGRAM IMPLEMENTATION PLAN

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SRS ES&H
STANDARDS COMPLIANCE PROGRAM
IMPLEMENTATION PLAN (U)

September 8, 1993

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**SRS ES&H STANDARDS COMPLIANCE PROGRAM
IMPLEMENTATION PLAN (U)**

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Table of Contents

1. INTRODUCTION	4
2. ORGANIZATIONAL STRUCTURE AND RESPONSIBILITIES	4
2.1 DOE-Savannah River (SR)	4
2.2 Westinghouse Savannah River Company (WSRC)	5
3. PERSONNEL QUALIFICATIONS	8
3.1 Education and Experience	8
3.2 Training	9
4. ADMINISTRATIVE PROCEDURES	9
5. STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT (S/RID)	10
5.1 Types of S/RIDs	10
5.2 Categories of Facility Operations	11
5.3 Functional Areas	12
5.4 Determination of ES&H Basis	13
5.5 S/RID Development	13
6. ADEQUACY ASSESSMENT	14
7. COMPLIANCE ASSESSMENT AND DOCUMENTATION	14
7.1 Compliance Assessment	15
7.2 Compliance Assessment Documentation	15
8. DISPOSITION OF NONCOMPLIANCES	15
9. CONFIGURATION MANAGEMENT SYSTEM	16
10. QUALITY ASSURANCE	16
11. REFERENCES	17

1. INTRODUCTION

On March 8, 1990, the Defense Nuclear Facilities Safety Board (DNFSB) issued Recommendation 90-2 to the Secretary of Energy (Ref. 11.1). This recommendation, based upon the DNFSB's initial review and evaluation of the content and implementation of standards relating to the design, construction, operations, and decommissioning of defense nuclear facilities of the U. S. Department of Energy (DOE), called for three actions:

- (1) Identification of specific standards that apply to design, construction, operation and decommissioning of DOE facilities;
- (2) Assessment of the adequacy of those standards for protecting public health and safety; and
- (3) Determination of the extent to which they have and are being implemented.

This Implementation Plan presents the methodology for support of the DOE Headquarters (HQ) Recommendation 90-2 Implementation Plan (Ref. 11.4) at Savannah River Site (SRS).

The purpose of this Implementation Plan is to define the single program for all sitewide and facility 90-2 ES&H Standards Compliance efforts, which will satisfy the HQ Implementation Plan, avoid duplicate efforts, be as simple and achievable as possible, include cost-saving innovations, use a graded approach based on facility hazards and future needs of facilities, and support configuration control for facility requirements.

The Defense Waste Processing Facility (DWPF) has been designated a pilot facility for the 90-2 program and has progressed with their facility program ahead of the site-level program. The DWPF, and other Government-Owned Contractor-Operated (GOCO) facilities that progress on an enhanced schedule, will serve as pilot facilities for the site-level program. The lessons learned with their requirement identifications, and their assessments of the adequacy of and their compliance with these requirements will be used to improve the efficiency of the site-level and subsequent programs.

2. ORGANIZATIONAL STRUCTURE AND RESPONSIBILITIES

WSRC created a central management and production organization to support the WSRC Program Director in implementation of DNFSB Recommendation 90-2. Qualifications and duties of the personnel within that organization are given below. The organizational line reporting structure is depicted in Figure 2-1.

2.1 DOE-Savannah River (SR)

The Director, Quality Programs Division (QPD) is responsible for providing DOE direction for the WSRC program implementation at SRS and for monitoring program progress. The Director QPD approves or recommends for DOE approval the Program Management and Implementation Plans, subsequent revisions, and the SRS Site and Facility RIDs.

The ES&H Standards Compliance deliverables will be submitted to QPD. These deliverables are S/RIDs, SME comments and resolutions, and S/RID compliance assessments.

**Figure 2-1
ES&H Standards Compliance Program Management Group
Organization Chart**

2.2 Westinghouse Savannah River Company (WSRC)

WSRC has responsibility for managing and performing the DOE authorized site-level and facility-level programs.

2.2.1 Facility Managers

- Implements facility specific ES&H Standards Compliance Program, consistent with the site-level PMP and the site-level Implementation Plan
- Identifies and approves Facility Technical Experts and approves Functional Area Experts and Subject Matter Experts assigned for Facility S/RID development
- Approves the Facility S/RID for WSRC. The WSRC ES&H Standards Compliance Program Director shall submit the Facility S/RID to the Facility management after ES&H Standards Compliance Program approval

- Complies with the approved S/RID requirements. This responsibility includes conducting compliance assessments, documentation and reporting of compliance status, and tracking resolution of any identified non-compliances

2.2.2 Chief Engineer

- Approves the Site-Level ES&H Standards Compliance Program Management Plan and all revisions to program cost estimates
- Appoints the WSRC ES&H Standards Compliance Program Director and is responsible for monitoring his/her performance
- Provides Executive Oversight of WSRC ES&H Standards Compliance Program

2.2.3 System Engineering Manager

- Determines staffing and budget for ES&H Standards Compliance Program activities
- Sets ES&H Standards Compliance Program goals
- Evaluates ES&H Standards Compliance Program effectiveness

2.2.4 ES&H Standards Compliance Program Director

- Develops and issues the site-level Management Plan and revisions to program cost and schedule estimates in coordination with WSRC Division delegates
- Approves the site-level ES&H Standards Compliance Implementation Plan and administrative procedures
- Implements the site-level program and coordinates the facility-level programs. Develops facility-level programs, consistent with this site-level PMP and the site-level Implementation Plan in conjunction with facility management
- Selects the Functional Area Experts and Subject Matter Experts
- Develops the facility-level S/RIDs, using Facility Technical Experts and Functional Area Experts. This responsibility includes ensuring that the identified site and facility standards/requirements are adequate and sufficient for the protection of the environment and the health and safety of workers and the public
- Provides the main ES&H Standards Compliance interface for DOE and DNFSB
- Provides strategic direction of the WSRC ES&H Standards Compliance Program

2.2.5 ES&H Standards Compliance Program Implementation Manager

- Provides day to day Management of WSRC ES&H Standards Compliance Program Central Group Personnel

- Provides training and development of ES&H Standards Compliance Program personnel
- Issues ES&H Standards Compliance Program progress and status reports to WSRC Divisions and DOE-QPD

2.2.6 Lead Engineers

- Writes the Site ES&H Standards Compliance Program Implementation and Management Plans
- Writes the Site and Facility administrative procedures
- Estimates resource needs and schedules for facility and site programs
- Leads individual Facility and Site ES&H Standards Compliance Program Implementations
- Directs FTEs, FAEs, and SMEs to deliver a quality product within established cost and schedule goals

2.2.7 Facility Technical Experts (FTEs)

- Reviews and concurs with the FA S/RID outline
- Reviews and approves the final FA S/RID
- Assists in resolving SME comments

2.2.8 Functional Area Experts (FAEs)

- Develops the FA ES&H Safety Basis
- Develops the FA S/RID outline
- Prepares the FA S/RID
- Resolves FTE and SME comments on the S/RID
- Approves the S/RID

2.2.9 Subject Matter Experts (SMEs)

- Reviews and concurs with the FA ES&H Safety Basis
- Reviews the FA S/RID
- Assesses the adequacy of the FA S/RID requirements
- Provides documented additions, deletions, and changes based on functional area experience and knowledge
- Approves the S/RID

2.2.10 Compliance Assessors (CAs)

- Provides documented evidence to the Facility Manager that the written site and facility policies, procedures, and programs articulate the standards and requirements contained within the S/RID
- Provides documented evidence to the Facility Manager that the policies, procedures, and programs are demonstrably adhered to by personnel during office or facility activities

2.2.11 Database Administrator and Software Engineer

- Performs database development and data management
- WSRC Interface with Westinghouse M&O data base development effort
- Implements the database interface with Order Compliance Activities

2.2.12 Manager, WSRC Engineering Initiatives

- Interfaces with WSRC Division Chief Engineers
- Coordinates the ES&H Standards Compliance Program and other requirements/compliance initiatives

3. PERSONNEL QUALIFICATIONS

3.1 Education and Experience

Qualification and training statements shall be maintained for all program personnel. This effort is to be consistent with DOE Order 5700.6C criterion 2 and DNFSB Recommendations 91-1 and 92-7.

3.1.1 Program Management Personnel

- Possess a B.S. Science/Engineering degree
- Completion of an applicable professional or industry standard qualification program may be substituted for the degree requirement (i.e., NRC Operator's License, Professional Engineering Registration)
- Significant additional experience may be substituted for the degree requirement
- Five years experience in Engineering, Maintenance, Facility Operations, or Program Management (or Software or System Development for data base personnel), and relevant experience in the application of codes and standards

3.1.2 Facility Technical Experts (FTEs)

FTEs will have extensive knowledge of the implementing practices and procedures at the facility related to their functional area in the S/RID. This knowledge will generally be gained from one or more years of experience working or managing in the particular facility and functional area.

3.1.3 Functional Area Experts (FAEs)

FAEs will possess a four year technical college degree or equivalent (4 years related experience or related professional certification) and have five or more years of experience in the particular FA. Personnel with experience at the particular facility and experience including codes and standards experience in the commercial or Naval nuclear industry are preferred. Note: The FAE and FTE may be the same person, provided that individual has the qualifications for each position.

3.1.4 Subject Matter Experts (SMEs)

SMEs will possess an advanced technical degree or equivalent (6 years related experience or related professional certification) and have ten or more years of experience in their particular FA, with knowledge in more than one FA preferred. Experience in functional areas shall include codes and standards experience in the commercial or Naval nuclear industry or the chemical industries, as appropriate. SMEs are not associated with the facilities being assessed.

3.1.5 Compliance Assessors (CAs)

CAs shall possess knowledge of the implementing practices and procedures at the facility, and one or more years of experience working in the applicable functional area at the facility. CAs shall also have knowledge of compliance assessment methodologies.

3.2 Training

Personnel involved with the development and implementation of the ES&H Standards Compliance Program shall receive sufficient instruction to ensure an appropriate understanding of:

- DNFSB Recommendations 90-2 and 91-1
- HQ Implementation Plans for DNFSB Recommendations 90-2
- DP-AP-202, DOE Order Compliance Self-Assessment Instruction
- HQ, ES&H Configuration Guidelines
- Westinghouse Procedure Manual 8B, DOE Directives Administration Procedures
- ES&H Standards Compliance Program Management Plan
- ES&H Standards Compliance Program Implementation Plan
- Appropriate Site and Facility Implementation Procedures

Continuing Training

- Lessons learned from completed projects and programs
- DOE workshop information

4. ADMINISTRATIVE PROCEDURES

Administrative procedures specific to the ES&H Standards Compliance Program shall be developed to govern site and facility programs and provide guidance to all ES&H Standards Compliance Program personnel (i.e., ES&H Standards Compliance Program Management, Facility Technical Experts [FTEs], Functional Area Experts [FAEs], Subject Matter Experts [SMEs], etc.) in the areas of Environment Safety and Health (ES&H) bases, requirements identification, adequacy assessments, and compliance assessments. Approved procedures shall be used at each facility conducting a ES&H Standards Compliance Effort.

Once formal administrative procedures are established, it is anticipated that they can be used, with minor changes, at each facility conducting a ES&H Standards Compliance effort.

Formal administrative procedures shall document:

- The specific actions required to develop Functional Area (FA) ES&H bases
- Methods of identifying standards, laws, rules, regulations, and other Standards/Requirements Identification Document (S/RID) requirements
- The screening and graded approach processes used to determine the applicability of source requirements
- The SME review process used to determine the adequacy of identified source requirements in supporting the FA ES&H bases
- The S/RIDs approval process
- The compliance assessment process
- The configuration management system
- The independent assessment process (i.e., DOE Order 5700.6C, "Quality Assurance," criteria 3, 9, and 10)
- The continual S/RIDs updating process

This effort is to be consistent with DOE Order 5700.6C, "Quality Assurance," particularly criteria 4 and 5.

5. STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT (S/RID)

S/RIDs will identify the necessary and sufficient set of requirements to protect public, worker safety and health, and the environment. There will be two levels of S/RIDs developed for SRS under this plan: the SRS Site S/RID and Facility S/RIDs.

5.1 Types of S/RIDs

5.1.1 Site S/RID

The SRS specific requirements applicable to the four categories of facility operations will be identified as applicable to the site, the facility, or both. For requirements applicable to the facilities, the requirement will be identified as applicable to the appropriate Categories of Facility Operations (below).

5.1.2 Facility S/RID

The applicable Site FA S/RID containing the overlapping facility requirements will be the basis for the development of S/RIDs for those SRS facilities that were identified for this program. The FAE will then assess this S/RID for applicability to their facility and will extract the applicable facility-level requirements for the facility S/RID. The FAE then adds the facility-specific standards and requirements and assesses the adequacy of the identified requirements.

5.2 Categories of Facility Operations

Each of the applicable SRS facilities is assigned one of four categories based on the key characteristics of mission, remaining lifetime, and facility age. This information may be considered when determining FAs applicable to a facility. Facility category is not intended to affect the level of S/RIDs detail or the rigor of compliance assessments. For example, if a Decontamination and Decommissioning-categorized facility has a high radiological hazard, protection of the public, worker, and environment shall be assured independent of the general assumptions in the facility categorization.

Functional Areas for a given facility will be compatible with a facility's current status. Functional Areas will be added or dropped as the facility mission changes and as part of the regular S/RIDs review and update cycle. Justification for exclusion of any Functional Area will be documented.

The selection criteria for the four categories are in accordance with the HQ plan and are defined as:

5.2.1 Operating Facility (OP)

The OP Facility is characterized by some combination of the following elements:

- Operates or is ready to operate (i.e., readiness review or evaluation completed);
- Is relatively new or was recently refurbished;
- Has an identified mission;
- Has an adequate SAR and OSRs or Technical Specifications substantially based on the current mission;
- Has no known major safety uncertainties based on Tiger Teams reviews, Technical Safety Appraisals, and ORRs ;
- Has a low safety uncertainty.

5.2.2 Mission Transitional Facility (MT)

The MT Facility is characterized by some combination of the following elements:

- Is in transition from operating to shutdown, to long-term surveillance and maintenance, or to decontamination and decommissioning;
- Usually quite old;
- Does not have an SAR that describes current mission;
- Does not have an adequate SAR or OSR for current activities;
- Does not meet current design and construction standards for new facilities;
- Has substantive safety problems based on Tiger Team reviews, Technical Safety Appraisals, or other safety reviews;
- Requires an initial safety assessment;
- Has higher safety uncertainty.

5.2.3 Decontamination and Decommissioning Facility (D&D)

A D&D Facility is characterized by the following elements:

- Consists of facilities and structures (not environmental restoration);
- Is usually low hazard;
- Is subject to applicable requirements of the Resources Conservation and Recovery Act (RCRA), or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA);
- Includes facilities in long-term surveillance and maintenance.

5.2.4 Environmental Remediation Facility (ER)

An ER Facility is characterized by the following elements:

- Is an inactive waste site (contaminated soil or underground water, not structures);
- Contains possibly highly hazardous materials;
- Has a remedial investigation subject to applicable requirements of RCRA/CERCLA;
- Has an SAR that may be a generic/site SAR plus an addendum for the specific activity.

5.3 Functional Areas

The site S/RID and the facility S/RIDs will be structured into FAs that were selected by HQ because of their significance for ES&H protection. DOE ES&H Configuration Guidelines (Ref. 11.10) were generated to provide confidence that key aspects of site or facility ES&H are properly considered and addressed during S/RID development. The FA descriptions, with further breakdown by element and sub-element, provide a basis for evaluating the completeness and adequacy of the identified standards/requirements. Deviations from the FA or element and sub-element assignments presented in the ES&H Guidelines are allowed to account for unique facility requirements if the deviations are justified and documented in the FA S/RID. The FAs applicable to SRS are identified in Table 5.2-1.

**TABLE 5.2-1
FUNCTIONAL AREAS for SITE S/RID and FACILITY S/RIDs***

NUMBER	FUNCTIONAL AREA	NUMBER	FUNCTIONAL AREA
1	MANAGEMENT SYSTEMS	11	RADIATION PROTECTION
2	QUALITY ASSURANCE	12	FIRE PROTECTION
3	CONFIGURATION MANAGEMENT	13	PACKAGING AND TRANSPORTATION
4	TRAINING AND QUALIFICATION	14	ENVIRONMENTAL PROTECTION
5	EMERGENCY PLANNING AND PREPAREDNESS	15	R&D AND EXPERIMENTAL ACTIVITIES
6	SAFEGUARDS AND SECURITY	16	NUCLEAR SAFETY
7	ENGINEERING DESIGN	17	OCCUPATIONAL SAFETY AND HEALTH
8	CONSTRUCTION	18	WASTE MANAGEMENT
9	OPERATIONS	19	ENVIRONMENTAL RESTORATION
10	MAINTENANCE	20	DECONTAMINATION AND DECOMMISSIONING

* These Functional Areas represent minor modifications from those used as part of the pilot program.

5.4 Determination of ES&H Basis

The ES&H bases serve to protect the public, worker, and environment; and the S/RIDs requirements serve to ensure the integrity of the ES&H bases. The ES&H basis for a given FA is based on a review of documents which specify requirements and limits from the SAR, Technical Specifications, Hazards Analysis, DOE Orders, laws, etc. The ES&H basis for a FA should address the activities, hardware, software and/or hazards at a given facility or site that are pertinent to the FA. The ES&H basis helps in the identification and review of S/RIDs requirements from all sources. The documents the FAE shall review in the preparation of an ES&H basis may include, but are not limited to:

- Federal, state, and local laws and DOE Directives
- ES&H Configuration Guidelines for S/RIDs
- Safety Analysis Reports for SRS Facilities
- Applicable Environmental Impact Statements
- Hazards Analysis Documents (HAD)
- Design Process Hazards Reviews (DPHR)
- Operational Safety Requirements (OSR)

The FAEs shall develop ES&H Functional Area bases and, where applicable, a controlled listing of the safety classifications of systems, subsystems, and components will be used in the development of ES&H bases. The ES&H FA bases shall be formally documented for configuration control in the introduction of each FA S/RID.

5.5 S/RID Development

5.5.1 Potential Sources of S/RID Requirements

The FAE shall consider the listed sources for relevant requirements in each FA.

- DOE Orders/Directives/Guidance/Notices/Standards
- Federal, state, and local laws
- SRS Engineering Standards Manual (SRSESM)
- National Consensus Standards, Regulations, United States Nuclear Regulatory Commission (NRC) Requirements and Guidelines, Institute of Nuclear Power Operations (INPO) Guidelines
- Westinghouse Corporate Standards and Directives, Site Contract, Government Owned Contractor Operated (GOCO) guidance documents, DNFSB guidance documents
- Functional Area S/RIDs from other DOE GOCOs as available
- Unique SRS Site and Facility Requirements

5.5.2 Exclusion of Mandatory Requirements

For DOE Orders and Directives that are included in a S/RID, all RSAD-identified mandatory DOE Order statements shall be addressed. Federal, state, and local laws that apply to the S/RID shall also be addressed. Specific requirements may be excluded as outside the ES&H basis or redundant to an included requirement, however, justification for the exclusion must be documented.

5.5.3 Consideration of Prior Assessments of Requirements

The results of previously conducted site and facility reviews and assessments may be used to assist in developing the S/RID. Examples of existing and ongoing assessments are safety and hazards assessments, established baseline reconstitution, DOE Order compliance assessments, and the results from ORRs.

5.5.4 New Requirements

Requirements from source documents other than DOE Orders or Standards, that are judged by WSRC to have application outside SRS, will be identified in ES&H Standards Compliance Program status reports for potential inclusion in DOE Orders or Standards.

6. ADEQUACY ASSESSMENT

The site and facility technical experts will make the first determination of FA S/RID adequacy based on their professional experience and knowledge of the site and facility characteristics. The determination of adequacy includes evaluating the applicability and sufficiency of requirements identified. The site and facility technical experts are expected to be the primary knowledge source for additional standards/requirements specific to a particular SRS facility.

Additional standards/requirements from external sources may be identified by SMEs. These standards/requirements will be included in the S/RIDs of a given FA, unless the exclusion is justified and documented. Independent determination of the adequacy of the FA S/RID requirements, to protect the FA ES&H basis, shall be a primary SME responsibility. The result of these determinations and resolution of SME comments shall be documented for configuration control and shall be submitted to DOE along with the S/RID package. The mandatory DOE Order statements are considered in the development of the S/RID. Federal, state, and local laws and DOE Directives shall also be considered. The applicability of the standards/requirements is documented for a defense nuclear facility when an identified DOE (or other) standard or requirement is included in a S/RID. It is neither practical nor necessary to justify the exclusion of statements from the full universe of standards. Because DOE Orders represent the primary ES&H Baseline, justification for the exclusion of a mandatory DOE Order statement is required and documented.

SMEs may be affiliated with WSRC, HQ, outside contractors, etc. However, SMEs shall be independent of the assessed facility. SMEs will be recommended by the ES&H Standards Compliance Program Director and approved by the Facility Manager. SME signature on the S/RID signifies that all appropriate SME comments have been incorporated in the S/RID, and the S/RID adequately protects the FA ES&H basis.

7. COMPLIANCE ASSESSMENT AND DOCUMENTATION

The SRS compliance assessment management programs described in WSRC Procedure Manual 8B will be adapted to perform and document the S/RID compliance assessment. Requirement statements previously assessed to Manual 8B requirements (mandatory DOE Order statements) will be assessed by direct reference to that prior assessment. The procedure for this interface and for the assessment of the supplemental S/RID requirements will be identified in the site and facility specific procedures.

7.1 Compliance Assessment

The site or facility will conduct compliance assessments against the S/RID. Assessments will be performed by personnel that are knowledgeable of the FA being assessed. After completion of this compliance assessment, the degree of risk associated with any noncompliance will be assessed. The facility manager (functional manager at site level) will be responsible for timely risk assessment and noncompliance documentation, tracking, and resolution. Formal procedures will be utilized for compliance assessments, and the results of compliance assessments will be documented in detail for configuration control. If DOE Order compliance assessment information is available, it shall be used for S/RIDs compliance assessments to avoid redundant efforts and duplicated information.

Compliance assessment consists of two principal parts. The first may be called administrative compliance assessment, and the second may be called field implementation assessment. The administrative part consists of producing evidence that the written site and facility policies, programs, and procedures articulate the standards and requirements contained within the S/RID. All requirements in the S/RID must be reflected in local plans, programs, and procedures. The field implementation part consists of producing evidence that the previously documented policies, programs, and procedures are demonstrably adhered to by personnel during office or facility activities. Adherence will be considered technically adequate if there is evidence of the following conditions:

- Affected personnel are cognizant of the procedures. They should have completed (or currently be participating in) a training program commensurate with the requirements, and be able to demonstrate their understanding of procedures.
- A performance-based review indicates that personnel can safely execute the procedure to achieve the desired result.
- An assessment program is in place that meets criteria 3, 9, and 10 of DOE Order 5700.6C to evaluate adherence to S/RID requirements both by periodic line management self-assessment and by explicit independent review.

7.2 Compliance Assessment Documentation

The status of compliance with each S/RID requirement shall be determined by the assessor based on documented record reviews, interviews, inspections, or field observations. Evidence of compliance status is required to be documented in detail for configuration control. Reviews of procedures and other management controls or results and reports from appraisals and other audits or reviews can be used as evidence. When reports of previous audits, inspections, evaluations, or assessments are used as evidence of implementation, the reports must show that the activity covered in the specific requirement was reviewed and compliance was demonstrated. Documentation, such as checklists, data bases, computer printouts, or other methods, shall record actions taken to verify conclusions reached. Compliance assessment documentation requirements will be identified in facility-level procedures.

8. DISPOSITION OF NONCOMPLIANCES

Existing SRS management programs, as described in WSRC Procedure Manual 8B, will be used to address S/RID noncompliances (deviations with S/RID requirements shall be dispositioned as noncompliances and formally scheduled, tracked, and closed). Exemption Requests, Compliance Schedule Approvals (CSAs), and/or compensatory actions shall be initiated for all noncompliances. Specific guidance for interface with these management systems and tracking of noncompliance

resolutions will be included in the site-level and facility-level procedures. These existing WSRC systems provide for a formal assessment methodology including:

- Determination of the safety significance of the identified noncompliance
- Identification of proposed corrective actions, if required
- Benefits and costs of the identified corrective actions
- Resource needs and schedules for implementation of corrective actions
- Interim measures to mitigate risks while the noncompliance is corrected
- Authorization and approval requirements for the above actions

9. CONFIGURATION MANAGEMENT SYSTEM

A configuration management system for S/RIDs, S/RIDs adequacy assessments, and S/RIDs compliance assessments shall be developed to maintain the integrity and defendability of the ES&H Standards Compliance Program and to ensure documentation of changes or revisions is reflected throughout the S/RIDs and compliance assessments.

A configuration management system is necessary for the entire ES&H Standards Compliance effort to ensure that changes to requirements, new requirements, and new implementing procedures occur in a controlled fashion. This ensures that new requirements or changes to documents do not revise other documents out of compliance.

ES&H Standards Compliance and DOE Order Compliance efforts shall use database management systems to relate compliance assessments, compensatory actions, CSAs, and other relevant, common information. This will eliminate inconsistencies, redundant efforts, and traceability problems.

10. QUALITY ASSURANCE

Implementation of the ES&H Standards Compliance Program by WSRC personnel will comply with the applicable requirements of DOE Order 5700.6C, "Quality Assurance," especially criterion 2 (Training and Qualification), criterion 3 (Quality Improvement), and criterion 10 (Independent Assessment). This will ensure that properly qualified and trained personnel are used to conduct compliance assessments, to develop S/RIDs, and to provide the oversight for these activities.

In addition to the performance of assessments conducted by WSRC management and the DOE, Quality Assurance Surveillances will be conducted to verify implementation in accordance with requirements. Surveillances of ES&H Standards Compliance Program activities will be conducted by the Quality Assurance (QA) Department of the Engineering and Projects Division (E&PD). These surveillances will be conducted annually. E&PD QA will provide Systems Engineering Management and 90-2 Program Management with surveillance reports. Additional oversight will be provided by the WSRC Quality Assurance Department within the Environmental, Safety and Health and Quality Assurance (ESH&QA) organization. Audits, surveillances, and oversight activities will be conducted in accordance with Quality Assurance Plan (QAP) 18-1 or 18-2 of the WSRC Quality Assurance Manual, 1Q. Responses to surveillance and audit reports will be approved by the WSRC ES&H Standards Compliance Program Director. The status of open items will be tracked in the ES&H Standards Compliance Program Progress Reports.

The facility and site ES&H Standards Compliance Programs will be consolidated by the ES&H Standards Compliance Program Implementation Manager and reported at the Program level.

11. REFERENCES

- 11.1 DNFSB Letter, March 8, 1990, Conway (DNFSB) to Watkins (DOE), Transmittal of Recommendation to the Secretary of Energy pursuant to Section 312(5) of the Atomic Energy Act of 1954, as amended.
- 11.2 DOE Letter, June 15, 1992, Watkins (DOE) to Conway (DNFSB), Submittal of DOE's Implementation Plan in Response to Recommendation 90-2.
- 11.3 DOE-SR Letter, June 16, 1992, Richardson (DOE-SR) to Clark (WSRC-E&PD), Savannah River Site (SRS) Action Plan for Defense Nuclear Facility Safety Board (DNFSB) Recommendation 90-2.
- 11.4 DOE Letter, July 20, 1993, O'Leary (DOE) to Conway (DNFSB), Submittal of DOE's Implementation Plan in Response to Recommendation 90-2, Revision 4.
- 11.5 WSRC-TR-92-404, Rev. 0, January 8, 1993, SITE-LEVEL IMPLEMENTATION INSTRUCTIONS TO MEET DNFSB RECOMMENDATION 90-2.
- 11.6 DOE-SR Letter, April 30, 1993, Rollins (DOE-SR) to Rahe (WSRC-E&PD), SITE WIDE IMPLEMENTATION OF A STANDARDS COMPLIANCE PROGRAM.
- 11.7 DNFSB Letter, March 12, 1993, Conway (DNFSB) to O'Leary (DOE), Review of DOE's Implementation Plan in Response to Recommendation 90-2, Revision 3.
- 11.8 WSRC-TR-93-346, Rev. 1, September 8, 1993, SRS ES&H STANDARDS COMPLIANCE PROGRAM MANAGEMENT PLAN.
- 11.9 WSRC Procedure Manual 8B, DOE DIRECTIVES ADMINISTRATION MANUAL
- 11.10 DOE-HQ, ES&H Configuration Guidelines, May 6, 1993.

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