



Department of Energy

Washington, DC 20585

September 15, 1995

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

This letter transmits to you the attached Department Standards Committee Action Matrix dated September 15, 1995. This matrix outlines the action items approved by the Department Standards Committee to integrate and coordinate all standards-related activities (Commitment 2.2 of the Implementation Plan for Board Recommendation 94-5). The matrix is a living document which will be updated by the Committee especially as work continues on the "Necessary and Sufficient" process.

If you have any comments regarding this matter, please contact me at (202) 586-2407, or Mr. Richard Black at (301) 903-3465.

Sincerely,

A handwritten signature in black ink that reads "Orin F. Pearson".

Orin F. Pearson
Deputy Assistant Secretary
Nuclear and Facility Safety

Attachment

cc:
M. Whitaker, EH-9



ACTION MATRIX

September 15, 1995

DEPARTMENT STANDARDS COMMITTEE

TRANSITION TO STANDARDS-BASED MANAGEMENT
O. PEARSON
9/15/95

Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
MA	MANAGEMENT ACTIONS		4/21/95	7/7/95			
MA3	Establish the concept that flow out of revised Orders/Rules is flexible. (They provide an opportunity) Approved "situations" can be grandfathered. (EH)		4/21/95	4/21/95		EH	Decision made and committed. Further action contained in MA4 and MA6.
MA4	Establish line mgmt. ownership for directing the application of the flexibility of the revised Orders & implementation plans. Approved implementation plans may be "grandfathered" where appropriate. Where prescriptiveness is needed, it should be retained.	IS7	5/8/95	6/23/95		V. Stello (DP) R. Scott (EM) R. Hunter (NE) D. Nelson (ER)	Responsibility ongoing, specific action items elsewhere (94-5, IS9)
MA6	Provide flexibility in the scheduled review process for the revised Orders/Rules to ensure adequate review, especially for DNFSB and Labs.		4/21/95	5/11/95	Complete	Upper Mgmt.	
MA7	Provide an effective mechanism for resolution for substantive disagreements raised during the review/comment process on the revised Orders/Rules.		4/21/95	5/11/95	Complete	Upper Mgmt.	
MA8	Emphasize that the N&S process is not available for use until authorized following the pilots and finalization of the Process.		6/29/95	7/7/95	Complete	T. O'Toole (EH LEAD)	

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Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
IS	INTERIM SAFETY MANAGEMENT ISSUES		6/29/95	2/1/96			
IS1	Issue a memorandum explaining relationship of new directives, acceptable implementation processes, including "staying the course" as appropriate under existing requirements and the proposed "necessary and sufficient" process, and performance expectations.	94-5: 1.1, 2.6, 3.3	6/29/95	9/15/95		T. O'Toole (EH) R. Nordhaus (GC) M. Morris (HR)	
IS2	Issue final DOE Order 251.1 on DOE Directives System to better explain relationship between policy, requirements, guidance, and the technical standards and implementation processes and expectations.	94-5: 1.2	6/29/95	10/13/95		M. Morris (HR)	
IS3	Develop the scope, format, content and schedules for seminar training to assure key personnel are schooled on transition to standards-based safety management, and current expectations regarding implementing and complying consistent with DSC plan.	94-5: 1.3, 2.5	6/29/95	10/30/95		D. Knuth (DP) R. Scott (EM)	
IS4	FAR Manual to be restructured at appropriate time to reflect results of strategic alignment and/or revised Orders/Rules.		6/29/95	2/1/96		O. Pearson (EH)	Or 60 days after issuance of the nuclear safety management rules in 10CFR Part 830.
IS5	Issue DOE guidance or standard on the Order exemption process.		6/29/95	10/13/95		O. Pearson (EH) M. Morris (HR)	
IS6	Issue Policy statement on procedures for developing, implementing, and achieving compliance with nuclear safety requirements.	94-5: 2.1, 3.2	6/29/95	9/15/95		D. Smith (GC)	

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Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
IS7	Issue the DSC action plan that integrates and coordinates all standards-related activities. This action plan is a living document and will be revised as appropriate.	94-5: 2.2, 3.1	6/29/95	9/15/95		T. O'Toole (EH)	
IS9	Discuss with the Board the path forward and value of continuation of Recommendation 90-2 and 93-1 in light of DSC action plan.	94-5: 2.4	6/29/95	9/29/95		D. Knuth (DP) R. Scott (EM)	
IS10	Develop plan and schedule for the conduct of a Department-wide workshop that explains the DSC action plan and assures program and field questions relative to the standards-based safety management program are addressed.	94-5: 2.3	6/29/95	9/29/95		T. O'Toole (EH)	
IS12	Reemphasize direction on continuous improvement and a consistent approach for all safety and health activities beyond minimal compliance as stated in the Environment, Safety and Health Policy for the Department of Energy Complex, dated July 20, 1993.	94-5: 3.4	6/29/95	9/15/95		T. O'Toole (EH)	

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Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
CP	For the Creation and Processing of New Requirements or Guidance Documents of General Application		4/21/95	2/1/96			
CP2	Modify the processes used for Rules and Technical Standards to incorporate the key features of the new Directives System (especially upfront screening for need and the cost/benefit features).	IS1	4/21/95	2/1/96		D. Black (EH) D. Smith (GC)	
CP3	Include in the mgmt. plan a concise (high-level) description of the structure we are heading toward and the elements of the current structure which will be preserved to provide for the transition.	IS7, NS14	5/26/95	12/29/95	See Comments	M. Sturdivant (EH) DSC SPAT 1	Must be completed prior to recommendation to roll out Necessary & Sufficient.
CP5	Redefine, as necessary, the concept of "authorization basis" to provide for the spectrum of work in DOE.		6/23/95	1/15/96		K. Klein (RFO) M. Sturdivant (EH) D. Knuth (DP)	CP3 and CP5 are related

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Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
CC	CONSISTENCY AND CLARIFICATION ACTIONS		4/21/95	1/1/96			
CC1	Revised Orders and new Rules crosswalk from old Order requirements.		4/21/95	10/30/95		R. Black (EH)	Individual Orders may exceed this date depending on actual finalization date.
CC4	Timely legal work needed for consistency of contract reform, revised Orders/Rules, Implementation plans, PAAA and N&S.		4/21/95	12/29/95		D. Smith (GC)	Activities ongoing: CC4 and CC9 are related
CC7	Oversight plan for dealing with the revised Orders/Rules.		4/21/95	10/30/95		G. Podonsky (EH)	Tied to issuance of revised Orders.
CC8	Description of how enforcement is "triggered" (levels, criteria, applicability).		4/21/95	10/30/95	Draft complete	K. Christopher (EH) D. Smith (GC)	
CC9	Revise the Rules and planned contract language to provide for N&S and to ensure the intended flexibility of application is clear, including grandfathering in appropriate situations.		4/25/95	1/1/96		D. Smith (GC) D. Black (EH)	Needed prior to roll out of Necessary & Sufficient.

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Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
NS	N&S DEVELOPMENT PLAN ACTIONS		4/21/95	12/29/95			
NS1	Develop contract language to incorporate approved necessary and sufficient sets for authorized pilots.		4/21/95	12/29/95		D. Smith (GC)	Needed prior to roll out of Necessary & Sufficient.
NS2	Oversight plan for N&S developed and evaluated during pilot period.		4/21/95	10/30/95	Draft complete	G. Podonsky (EH)	
NS3	Prior to authorization for N&S Process, applications require authorization by DSC, PSO, and EH.		4/21/95	5/1/95	Complete	T. O'Toole (EH)	
NS5	Review plans for pilots and consider any additional applications which may be needed, based on pilot experience.		4/21/95	6/23/95	Complete	M. Sturdivant (EH) DSC SPAT 3 & 4	NS5 precedes NS8
NS6	Refine N&S Process criteria for DSC review.		8/29/95	10/30/95		M. Sturdivant (EH) DSC SPAT 3 & 4 GC	NS8 precedes NS6. NS12 precedes NS6. Needs to be completed prior to roll out of Necessary & Sufficient.
NS7	Develop actions and resources needed to support DSC activities on Necessary & Sufficient.		4/21/95	10/30/95		M. Sturdivant (EH) SPAT 3 & 4	

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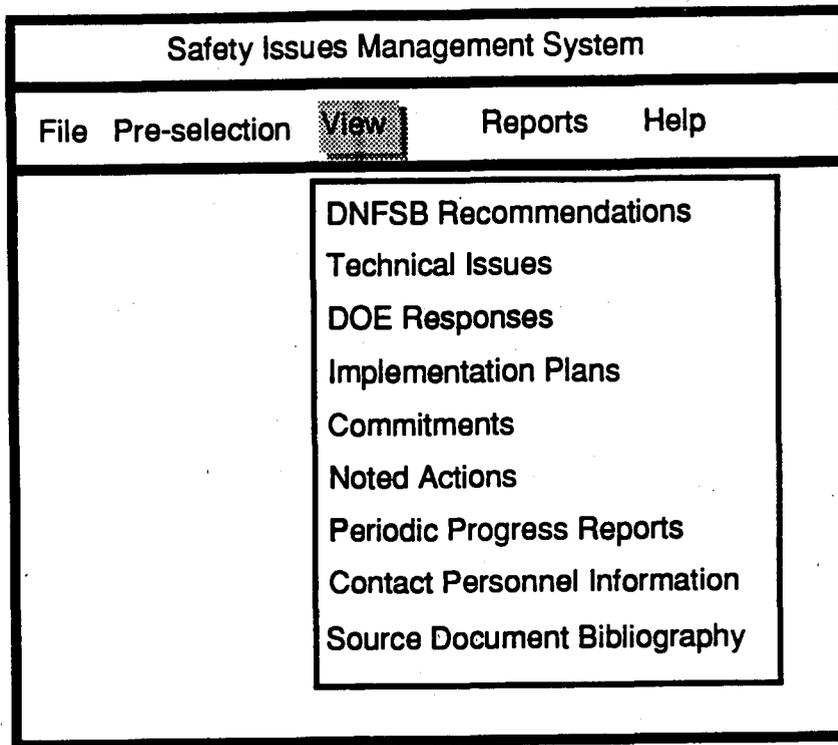
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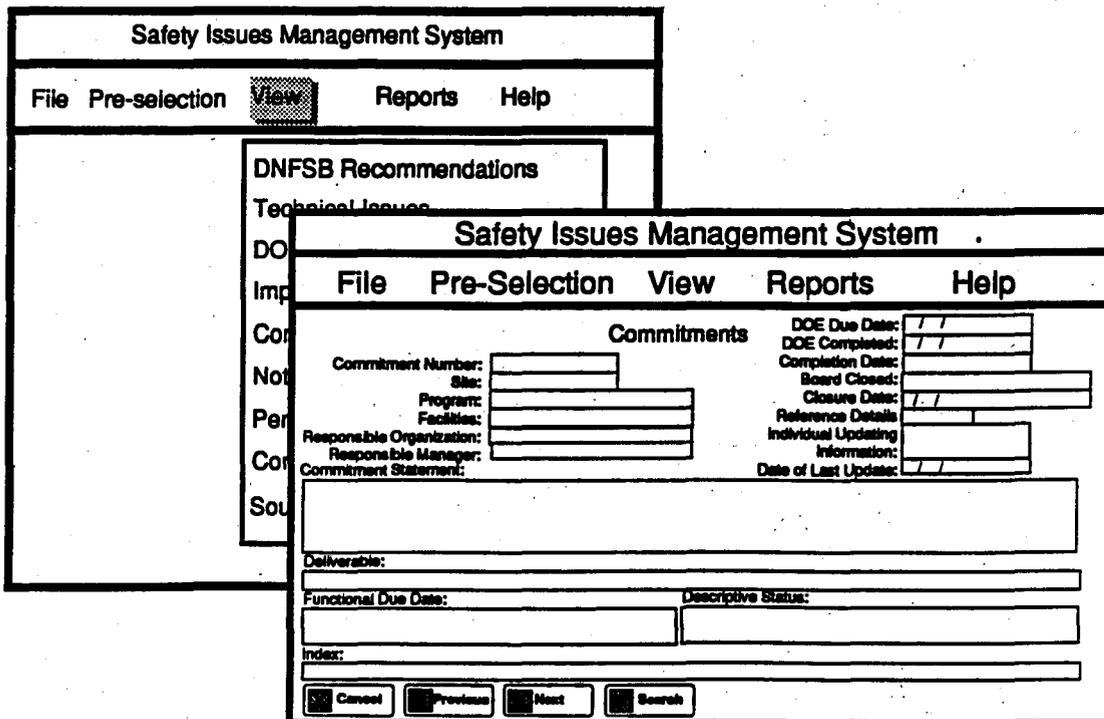
Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
NS8	Complete pilot evaluation process for DSC review.		6/29/95	9/29/95	Draft complete	M. Sturdivant (EH) DSC SPAT 3 & 4	NS5 precedes NS8 NS8 precedes NS6
NS9	Complete communication plan for DSC review, including internal and external strategies and messages. (Communications Focus Group)		4/21/95	10/30/95		C. Zamuda (FE)	
NS10	Develop training plan for N&S deployment, including limitations/staging needed to accommodate resource constraints related both to accomplishing the training and to using it. (Training Working Group)	IS3, IS10	4/21/95	9/29/95	Draft complete	F. McCoy (SRS) Focus Group	Needed prior to roll out of Necessary & Sufficient.
NS12	Provide the appropriate legal guidance for "grandfathering" of facilities with approved safety bases when the N&S process is authorized for implementation (GC, EH, Line Mgmt.)		4/21/95	12/29/95		R. Black (EH) D. Smith (GC)	
NS13	Further develop for DSC review guidelines for stakeholder participation and for worker involvement in the N&S process (DSC Working Group).		4/21/95	9/29/95		D. Bergman (AL) SPAT 8	
NS14	Develop Rollout Plan for N&S process. (Rollout Focus Group)		9/22/95	12/29/95		R. Hunter (NE) C. Langenfeld (CH)	
NS15	Develop plan for mobilization and moving of technical resources for implementation of N&S process.		9/29/95	12/29/95		M. Sturdivant (EH)	To be worked with NS14

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Task ID	Task Name	Cross-Reference	Start	Finish	Status	Responsibility	Comments
NS16	Determine need and structure of a management information system to facilitate N&S process.		8/18/95	9/29/95		D. Nelson (ER)	



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