



REMARKS

BY

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ON

INTEGRATED SAFETY MANAGEMENT SYSTEM (ISMS)

“MAKING ISM A REALITY” WORKSHOP

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I am glad once again to join with you in a workshop on Integrated Safety Management. The Defense Nuclear Facilities Safety Board (Board) as a whole, and I personally, continue to give this upgrade safety program of the Department of Energy (DOE) high priority attention. The Board communicates regularly with senior officials at DOE Headquarters and maintains close observation, directly and through its staff, of implementation efforts in the field. The Board holds open quarterly status review meetings. Transcripts of the reports by DOE and its contractors and by Board staff are available in our public document room. The last such meeting was held in October and our next has been tentatively scheduled for early December. Well, what do these reports show? My impressions are:

1. Upper level management of both DOE and its contractors remains highly supportive and pro-active.
2. Worker involvement in work planning at the task level continues to grow to very good effect. Workers are seeking more involvement, not less.
3. Pockets of resistance and skepticism are manifest, particularly at the mid-management level. The old, less constrained ways of doing business are still preferred and followed when opportunities arise. (Here at Oak Ridge, restart operations at Y-12 are in a stand-down state to address procedural issues.)
4. Progress is more advanced at some sites than others. The sites with multiple contractors are having the most problems in achieving site-wide consistency in applications of ISM concepts.
5. Some sites, such as Rocky Flats and Los Alamos, have used the ISM functions and principles as factors in assessing safety performance. Results are revealing those activities meriting priority attention, but, also, improvement trends. It is important that such self-assessments be made and management's actions geared to them.
6. Effective implementation remains as the greatest challenge. Papers describing great-sounding programs are necessary but are not sufficient to achieve the sustained, regularized practices required at the work sites.
7. Doing Work Safely is the foremost objective of Integrated Safety Management. Nuclear safety is an important but not the exclusive target of Integrated Safety Management. Non-radioactive but hazardous materials and operations require attention at least in proportion to the risks they represent to workers, public and the environment. It is not evident to me that this aspect of ISM is receiving the attention it deserves.
8. Complex-wide, considerable progress has been made, as evidenced by Phase I and II verification reviews to date. Joe Arango has led a team that has reviewed the verification activities to date. Joe will be sharing their observations with you at this meeting. Similarly, Emil Morrow for Defense Programs (DP) and Irwin Spickler for Environmental Management conducted a review of authorization

agreements. Results were equally informative and should be helpful to those involved in establishing such agreements.

The Secretary of Energy has targeted September 2000 for full implementation across the DOE complex. All of us should continue our efforts to meet or better that target date.

With this brief summary on status, let me share with you some observations on a number of developments that could impact our efforts.

1. As you know the recent criticality accident in Japan has raised the concerns of Congress as to the safety management of similar DOE activities. Further, the House Committee on Commerce has requested the Government Accounting Office (GAO) to evaluate for them the merits of ISM. DOE has advanced ISM as an alternative to external regulation. Both the Board's and DOE's staff have met with GAO investigators and undoubtedly will do so again before GAO files their report. I am confident in the case ISM can make but a positive report cannot be taken for granted. Demonstration of effective enforcement of agreed-upon safety measures will be required to make a convincing case. Further, any serious safety incident anywhere in the DOE complex could nullify the effective upgrades in safety management accomplished by the DOE complex to date.
2. Accountability—This is a major target of attention by DOE Management—and rightfully so. Accountability, for what, you might ask. For the Federal work force, it is for the performance of functions and responsibilities as assigned in the Function and Responsibilities Authorities Manual (FRAM). For the contractors, it is performing contracted obligations on time, within budgets and within agreed upon safety constraints. The latter are those authorization agreements.

Under pressures from Congress, there is a movement afoot to convert some of the existing DOE nuclear safety Orders, enforceable under contract terms and conditions, to Rules, subject to enforcement under the Price-Anderson Act (PA). PA as you know is a statute authorizing civil and criminal penalties for violations of nuclear safety requirements. Unless carefully circumscribed and administered, this added emphasis on enforcement of nuclear safety requirements under PA provisions could create an imbalance in enforcement actions to the detriment of non-nuclear safety. Regardless of what comes of this initiative, it behooves contract administrations to achieve consistency and balance in enforcement of terms and conditions established by contract with those established through rule-making.

3. Integrated Safety Management is a concept recommended by the Board and adopted by DOE because it best fit the diversity of programs and activities performed by DOE and its contractors. Its appeal and general acceptance stems in

part from its adaptability to both nuclear and nuclear hazards that are commonly found in so many DOE operations. To date, the sharing of this concept has been largely in-house. I believe it is time to go external and share with others in the nuclear industry what we are doing and to seek the benefit of what others outside of DOE have done to address nuclear and non-nuclear hazards as a cohesive whole. To that end, I arranged for a session on ISM at the forthcoming ANS meeting in Long Beach, California on November 16, 1999. To those who will be attending, come listen. For those who will not be able to attend, we will try to get presentations to Ted Wyca for distribution via the Internet.

Ted Wyka has arranged for an interesting workshop. I hope you can both learn from others and contribute to the dialogue.