



**Department of Energy**  
Washington, DC 20585

June 18, 2010

The Honorable Peter S. Winokur  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW, Suite 700  
Washington, DC 20004-2901

Dear Mr. Chairman:

Please find enclosed our revised Project Management Plan to implement the Department's 2010 Safety and Security Reform. We appreciate the resources the Board committed to reviewing an earlier draft of the plan and recognize your input contributed significantly to improvements in clarity of goals and reform processes. This revised plan reflects the commitments I made at the May 12, 2010, public meeting and addresses the comments provided by the Board staff.

If you have any questions, please contact me at (202) 287-6071.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "G. Podonsky".

Glenn S. Podonsky  
Chief Health, Safety and Security Officer  
Office of Health, Safety and Security

Enclosure

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PAGE

**Project Management Plan  
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Key Assumptions: (1) total of 130-day development period after the JM is approved, which includes four reviews (Red-team review, Board staff review, HSS internal review, and MA editorial review), in parallel, after the team prepares the draft revision, (2) 45 day RevCom review period (no extensions requested/granted), (3) 45 day comment resolution period, (4) no non-concurrences/no impasses, (5) DRBs can be scheduled in 2 weeks after receipt of JMs and AMs, (6) no additional effort is required to address issues raised by the DRB. For estimating interim project milestones, managers should adjust this sample schedule using their best judgment for applicable directives, magnitude of proposed changes, and available resources.

**Project Management Plan  
DOE 2010 Safety and Security Reform**



**June 2010  
Revision 2**

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SAFE SAFETY BOARD

Approved: *Stephen A. Kirchhoff*

**Stephen A. Kirchhoff,  
Project Manager  
Office of Health, Safety and Security**

Approved: *W. A. Eckroade*

**William A. Eckroade,  
Deputy Chief of Operations,  
Office of Health, Safety and Security**

## **Project Management Plan DOE 2010 Safety and Security Reform**

**Project Scope:** This Project Management Plan provides direction for implementing the Department's 2010 safety and security reform plan in a disciplined manner. This Project Management Plan describes how the Office of Health, Safety and Security (HSS) will lead and manage this project on behalf of the Department, as HSS is the Office of Primary Interest (OPI) for the directive reforms that are called for in the Department's reform plan.

The scope of this project is defined by the Department's 2010 Safety and Security Reform Plan, approved by the Deputy Secretary on March 16, 2010 (see Attachment 1) and encompasses both independent oversight and enforcement reforms, and directives and requirements reforms. The project scope includes the following topical areas: worker safety; nuclear safety, environmental, and quality assurance; operating experience; oversight and enforcement; security; and classification. The directives within the reform scope are provided in Attachment 2.

**Project Objectives:** The Department's management principles make clear that it will succeed only through continuous improvement. In that spirit, the Department has been reviewing the Department's framework of requirements against its vital and urgent mission goals, while maintaining the highest standards of safe and secure operations at Departmental facilities. The objective of this project is to accomplish the end-state vision for safety and security reform, as defined in the Deputy Secretary's reform plan.

The end-state vision is for independent oversight and enforcement programs to better support DOE line management efforts to accomplish DOE missions by influencing the conduct and priorities of the responsible DOE contractors. Throughout the reform, rigorous and informed independent oversight of high-hazard operations and high-value security assets will be sustained.

The goal of the directives reform effort is a set of requirements that provides for the protection of workers, the public, and the environment effectively and efficiently. The requirements must be sufficient to direct the Department in performing its mission using the high standard of safety and security that its stakeholders expect. While requirements may be streamlined through consolidation or elimination of duplicative or unnecessary provisions, the reduction is intended solely to improve the clarity and usability – hence the effectiveness – of requirements; not to reduce DOE's expectations for high standards of safety and security. Any effort to overhaul the directive system must be undertaken with the objective of strengthening and improving the system while continuing to ensure adequate levels of protection and prevent accidents and incidents at defense nuclear facilities.

**DOE Directives Process for Revising Directives:** Changes to directives will be made in accordance with the Department's directives process, as defined in DOE Order 251.1C, *Department Directives Program*, approved January 15, 2009, supplemented by project controls described below. This process provides for deliberate and disciplined consideration of changes

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to DOE directives, with multiple opportunities for user review and feedback. For each directive revision (including those that may result in cancellations of other directives), the process includes the following major milestones for OPIs:

- Develop Justification Memo for Revision, approved by HS-1, for transmittal to the Office of Management (MA) for Directives Review Board (DRB) review and approval.
- Develop Draft Revision, and transmit to MA for release for Department-wide review and comments (via RevCom for Orders and Guides; via DRB coordination for Policies).
- Address comments received, develop Concurrence Revision, and transmit to MA for Department-wide Concurrence review (via RevCom for Orders and Guides; via DRB coordination for Policies).
- Address non-concurrences, if any, and develop Final Revision, and Approval Memo, approved by HS-1, for transmittal to MA for final DRB consideration and final processing.

**DOE Directives Process for Cancelling Directives:** Cancellation of directives will also be made in accordance with the Department's directives process, as defined in DOE Order 251.1C. The primary criterion for cancellation of directives, as defined in Order 251.1C, is continued relevancy. If a directive is no longer needed to provide for the protection of the workers, the public, and the environment, it may be proposed for cancellation. The stakeholder review process will help to ensure that no directives are cancelled inappropriately.

For each stand-alone directive cancellation (not directly related to a directive revision or consolidation), the process, as defined in DOE Order 251.1C, and MA administrative procedures, includes the following two major milestones for OPIs:

- Develop Justification Memo for Cancellation, approved by HS-1, for transmittal to MA for DRB review and approval, and release in RevCom system for 30-day Department-wide review and comments. Note: Justification memos submitted for cancelling a directive need to be substantive enough for a reader to understand why a directive is being proposed for cancellation.
- Address non-concurrences, if any, and develop Cancellation Notice, and Approval Memo, approved by HS-1, for transmittal to MA for final DRB consideration and final processing.

**Project Controls on Directive Revisions:** The Department is undertaking this reform effort in a disciplined manner, and will be careful to assess the content and value of each directive or requirement, and the consequences of its modification or removal. The Department is mindful of the need to ensure that the remaining directives and requirements are sufficient to direct the Department in performing its mission with the high standards of safety and security that its

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stakeholders expect. This section describes additional project controls placed on the directives revision and cancellation process to ensure that the project objectives are met:

- **Requirements Review.** This Project Management Plan calls for “streamlining” requirements to improve productivity and the end-state vision calls for safety and security programs without “overly prescriptive” requirements. The focus of streamlining will be on administrative and process requirements versus outcome or performance requirements. Stakeholder input and operating experience will be strongly considered in identifying streamlining opportunities. In some cases, as described in DOE Order 251.1C, detailed requirements will be needed to ensure appropriate standards of protection. To accomplish streamlining, writing teams will review each requirement individually to determine whether:
  - (1) The requirement should be retained, modified, or deleted, providing a basis for modification or deletion (which should reflect an appreciation of the original intent or basis of each modified or deleted requirement);
  - (2) Clarification or revision to the wording of the requirement is needed to make the requirement clear, concise, and sufficient, including ensuring its performance can be objectively determined, and the responsible party for the required action is clear;
  - (3) Additional requirements are needed to meet the objectives of the directive and to ensure appropriate standards of protection;
  - (4) Combining, consolidating, or eliminating requirements is needed to improve clarity and implement-ability, based on identification of overlapping, contradicting and duplicative requirements from related rules, directives, and standards, based on a system analysis;
  - (5) Changes are needed to related guides, standards, and other DOE directives concurrent with or subsequent to approval of the revised requirements, and the recommended timing of such changes.
  - (6) Applicability of requirements is clear and correct; and
  - (7) Technical basis for each requirement is defined to establish why the requirement is necessary and appropriate.
- **Stakeholder Engagement.** To ensure that stakeholders are engaged and their input is considered, participation from line programs will be solicited for conceptualizing, developing, and reviewing draft revisions. Input from National Laboratories, contractors, and worker unions is important and will be invaluable in the success of this

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reform; as DOE policy making is an inherently governmental function, DOE personnel must be responsible for making final decisions on directive contents. Stakeholder involvement will be solicited through participation in cross-disciplinary writing teams where practical; however, HSS as OPI has responsibility for project quality and schedule, consistent with the Deputy's direction and HSS's commitment, and cross-disciplinary writing teams may not be necessary or practicable in all cases. Stakeholder input and feedback is especially critical for determining whether directives are implementable and provide adequate flexibility. In addition to potential stakeholder participation on writing teams, senior line managers will be part of Red-teams and Executive Steering Committees (ESCs) to help provide guidance on both specific directives and the broader topical areas. Briefings on the Project Management Plan and expectations will be provided as needed to stakeholder participants, including ESC members, Red-Team members, and writing team members. (Note: Additional discussion regarding interface with the Defense Nuclear Facilities Safety Board is provided below.)

- Checklist for Directives Reform. A Checklist for Directives Reform, Attachment 3, will be used to guide directive revisions and cancellations. When reviewing an existing directive, if any of the checklist questions are answered "No," then a directive revision (or cancellation) may be needed. When reviewing a draft revision of a directive, all checklist answers should be "Yes" before moving forward for Department-wide review. For draft revisions, the checklist will be used by both the writing teams and the Red-team reviewers. This checklist may also be used to guide development of Justification Memos, especially for any stand-alone directive cancellations.
  
- Standards of Protection. For nuclear safety, the requirements in directives applicable to defense nuclear facilities must provide "adequate protection" of the workers, the public, and the environment. (Note: "Adequate protection" is a legal and regulatory term used relative to risks from nuclear facilities.) In all areas, the Department is committed to maintaining the highest standards of safe and secure operations. For topical areas other than nuclear safety, appropriate standards of protection need to be assured in all directive revisions. Reasonable assurance of appropriate standards of protection involves consideration and balancing of such factors as technical feasibility, safety or security risks, past performance (i.e., operating experience), the need for further improvements, advances in safety and security assurance, and costs. In practice, reasonable assurance is attained by engaging experienced professionals, using a deliberate, disciplined process to consider changes, performing detailed cross-walks between existing requirements and proposed changes, and obtaining independent reviews (such as those from Red-teams and ESCs). Where alternatives exist for methods of achieving the appropriate standards of protection, cost/benefit of various alternatives may be considered.



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- Systems Approach. A systems approach will be used for the various topical areas to ensure that the revised requirements framework (i.e., rules and regulations, directives, and technical standards) is clearly defined; the relationships among the various elements are described; and overlaps, duplications, and conflicting requirements are eliminated. In addition, a systems approach will assure that the framework provides the appropriate standards of protection. Consolidation of directives will be accomplished where possible to improve usability (so users do not have to jump between directives to understand requirements) and maintainability (so consistency can be preserved when future revisions are made). A desired requirements framework will be defined using a systems approach for each topical area and reviewed with the associated ESC and available for sharing with stakeholders. The requirements framework will delineate the purpose of each framework component (rule, regulation, directive, technical standard, etc.) and how the various components fit together to provide appropriate protection. A systems approach will be used to identify the current state (of established rules, regulations, directives and technical standards in that topical area), the desired future state, and the path to get there; the desired requirements framework will be revised as needed during the reform project based on ongoing review and evaluation. For management systems directives that cut across functional areas (such as those related to Integrated Safety Management and Quality Assurance), periodic HSS project meetings (discussed further below) will be used to coordinate and integrate efforts, and additional integrating mechanisms will be used as needed.
- Use of External Standards. Use of external, voluntary consensus standards, wherever possible, has been a long-standing policy and requirement of the Department (see Order 252.1, *Technical Standards Program*, November 19, 1999). Directive revisions will make use of applicable external standards where they will lead to achievement of the desired performance, and define responsibilities and additional requirements as needed to tailor usage for DOE. Stakeholders, including ESC members, will be encouraged to identify external standards that may be applicable.
- Requirements Tracking and Basis Documentation. In accordance with DOE Order 251.1C, all HSS directives “must be developed using requirements tracking and basis documentation to permit users to trace any requirements in the original directive to the comparable requirement(s) in the revised directive and the basis for each requirement.” Revisions or conversions of directives containing requirements (Orders, Manuals, Notices) will be accompanied by requirements tracking (or cross-walks) and basis information including: a side-by-side comparison of existing and revised requirements (at the individual requirement or paragraph level); the disposition (retain, revise, cancel, etc.) of existing requirements; the basis for disposition; and the basis for requirements (including relevant external standards, operating experience, and commitments). Cross-walks will be used for: facilitating detailed review at the requirements-level; facilitating confirmation that changes at the requirements-level are appropriate; and

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communicating with stakeholders about the detailed dispositions and bases at the requirements-level. Cross-walks and bases will also be useful for implementation and future maintenance/revision of the directives.

- Continuity of Commitments. Where revisions remove requirements that were established based on Department commitments to external organizations, these will be clearly identified, the basis for the revised requirements/directives will be documented (such as through a cross-walk of requirements), and the external organization will be given an opportunity to provide input. As needed, previous commitments may be identified through subject matter experts and correspondence logs.
- Continuity of Directive Contents. Where contents in existing directives are deemed essential for continued safety assurance, such that they need to be retained in a DOE-approved document, such as another DOE directive or a DOE technical standard, then these directive contents will be migrated, through the Departmental directives process, to other approved directives or technical standards, before the current directive contents are cancelled. This may require careful phasing of changes, and may require documents to be issued concurrently.
- Red-Team Review of Draft Revisions. Prior to submission of revised directives for Department-wide review, a review will be conducted by a management-level team that includes HSS and line management stakeholders to provide an independent assessment on whether the directive meets the requirements of this Project Management Plan and is ready for Department-wide review. It is essential that broad, management perspectives be considered in addition to subject-matter-expert perspectives. The ESC described below will either serve as the “Red-team” or designate other management-level reviewers to serve. Where ESC members have a substantial role in developing the draft directive, they should name another management-level reviewer to provide independent review. Red-team reviews will use the checklist (Attachment 3) to guide the reviews. Requirements tracking and basis documentation (i.e., crosswalks) will be made available to the Red-teams to facilitate their review. HSS members on Red-teams should provide HSS internal review comments (including Quality Review Board comments) to be considered and consolidated with Red-team comments. The responsible HSS managers (HSS Level-1 Managers) must consider all Red-team comments, and should work to resolve all Red-team comments before moving forward to Department-wide review. In some cases, impasses cannot be resolved and Department-wide review is helpful in gaining additional input and in providing clear articulation of issues. The responsible HSS managers may move forward to Department-wide review with open Red-team issues only with the approval of the Deputy Chief of Operations, HSS.

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**Project Guidance on Directive Revisions:** This section describes additional project guidance by directive type to ensure that the project objectives are met:

- **Policies.** Policies communicate top-level expectations for DOE organizations, and as such have an important role in the DOE directive system. To the extent possible, policies should be consolidated to a critical few top-level policies that provide top-level expectations and objectives for broad HSS discipline areas, such as worker safety or nuclear safety. Policy statements for narrow topic areas should be rolled up into broader policies where appropriate or incorporated into other related directives.
- **Orders.** Orders are the primary directives for communicating requirements. These must be clear, concise, streamlined, performance-oriented, and have the appropriate level of prescription. DOE Order 251.1C requires that *“Directives shall be written clearly and will specify the goals and requirements that must be met and to the extent possible, refrain from mandating how to fulfill the goals and requirements, thus increasing emphasis on results. However, it will sometimes be necessary to specify how requirements are to be met in directives that cover high risk functions such as safety and security or areas that require consistency such as financial reporting and information technology.”* Where possible, opportunities to tailor requirements for specific hazards and unique solutions should be provided (such as, for example, through programs, plans, or procedures that can be defined by the implementers to meet top-level performance requirements).
- **Notices.** Notices are intended to be short-lived directives; associated requirements should be incorporated and integrated into existing requirements directives as needed. Preference should be given to revising existing directives, where appropriate, within a systems approach, rather than layering on new requirements documents, unless requirements differ significantly in function.
- **Manuals.** Manual revisions are not allowed by Order 251.1C. Material in Manuals needs to migrate to other locations, such as Orders for important requirements, or voluntary DOE technical standards for important methods that may be invoked. Regarding guidance in Manuals, see additional discussion under Guides.
- **Guides.** Guides, describing acceptable but non-mandatory methods for implementing requirements, serve an important purpose in the DOE directives system and should be retained where the contents are of such importance that use of alternate methods requires justification, as required by DOE Order 251.1C. All other existing guides should be considered for transfer to (1) voluntary DOE technical standards, for important, detailed methods that some stakeholders may invoke, (2) HSS reports or web-site references, for less important yet still valuable information, and (3) out-right

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cancellation, where the information is no longer needed and no longer relevant. Guides that are being revised should be reviewed to determine whether contents are clear, accurate, and valid. Where improvements are necessary, they should be made. Guidance should also be reviewed to determine whether it is necessary to elevate any elements to requirements and move these elements to appropriate directives as requirements. Guides should be reviewed to ensure that all guidance elements are consistent with the content requirements of Order 251.1C so that they “provide an acceptable, but not mandatory means for complying with requirements of an Order or rule (Paragraph 5.d);” this includes removal of any requirements-like statements. Where information in Guides is of such importance that it should be continued in a DOE-approved document, such as a technical standard, then the Guide may not be cancelled until the new document is issued to ensure continuity of the information. Note: all cancelled guides are retained on the directives web-site as archived directives.

**Disposition of Previous Project Plan for Safety Directives Revision:** In January 2008, the Department approved a project plan for revision of the set of HSS safety directives that include requirements. With issuance of this 2010 Reform Project Management Plan, the previous project plan is superseded. Under the previous project, HSS-led teams accomplished revision of the six safety directives through Department-wide review and comment, and all are nearing completion, with four approved and issued; this Project Management Plan calls for near-term completion of the two remaining revisions (for DOE O 422.X and DOE O 458.1). The previous project accomplished significant review and draft revision of the five additional safety directives, but these revisions have not yet entered Department-wide review; the current reform should build upon this previous work effort and move these revisions into Department-wide review expeditiously. Attachment 4 describes key lessons from the previous project and how these lessons are incorporated into this Project Management Plan.

**Line Stakeholder Engagement - Executive Steering Committees:** In addition to directive-specific Red-teams, responsible HSS managers will establish an ESC for each topical area for reform as one key measure to foster coordination across the Department’s internal line stakeholders. In some cases, existing bodies can serve in this capacity. Each ESC must include a representative from each of the three main programs (Science, Energy, and NNSA) and may also include additional members (such as field managers, Laboratory directors, and contractor executives) as needed. The members should be at the senior executive level and endorsed by their program leadership. The role of these ESCs is to provide overall guidance and steering for the reforms in their topical area. For example, they should review the current requirements framework and the desired end-state requirements framework, as well as the plan to achieve it. The ESCs should review the approach being used to develop each directive change, including the extent to which a cross-disciplinary writing team will be needed and used. The ESCs should also review the scope of major changes for directives being revised and, as possible, be provided copies of Justification Memos before they are reviewed by the DRB. The ESCs should also serve as the independent management-level review team (i.e., Red-team) to review all

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changes before they are submitted for Department-wide review; alternately, the ESCs may designate such reviewers to provide independent, management-level reviews for them. The ESC members may provide advice on staff and subject matter experts to support conceptualizing, developing, reviewing, and resolving comments on revisions to individual directives.

**Project Milestones:** Major milestones and a schedule will be developed for each directive within the scope of this Project Management Plan. Changes to the top-level milestones listed in the Deputy Secretary's March 16, 2010 memo (Attachment 1) are expected based on the project controls that are described in this Project Management Plan. Where changes to the top-level project schedule are needed to permit performance of a thorough review and development of a quality product, responsible HSS managers will provide status information and requests for additional time to the Deputy Chief of Operations, HSS. The overall project schedule will be updated and distributed periodically as needed.

Based on past experience, the back-end of the process, addressing stakeholder comments and obtaining concurrence, is a significant organizational commitment, and will be critical in obtaining the desired reform outcomes. HSS will track all the major milestones identified above, through to ultimate approval and issuance of the desired changes. Field implementation of changes will be the responsibility of the line organizations.

Identification and management of interim project milestones are important to facilitate effective project execution, work planning and resource loading. A summary overview of the process for directive revisions under this project, showing key project controls, is provided in Attachment 5, with a sample timeline for completing directive revisions provided in Attachment 6. For each directive that will be revised, at least the following interim project milestones will be identified (except for those directives that have already completed some of these milestones):

- Provide draft Justification Memo to MA for approval of intent to revise.
- Provide draft for Red-team review.
- Provide draft directive revision to MA for release to DOE-wide review.
- Provide comment resolutions and concurrence draft directive to MA for release for concurrence review.
- Provide final draft directive and Approval Memo to MA for final processing.
- Obtain final DOE approval of revision.

HSS leaders for the various topical areas are responsible for identifying the necessary interim project milestones in their topical areas at this granularity to ensure the project can be closely and accurately managed to success. For example, where activities are planned to evaluate potential regulatory changes, appropriate interim milestones should be established consistent with Department's process and Administrative Policy Act requirements. Wherever activities

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essential to the success of this reform are identified, related interim project milestones should be established. In some cases, interim milestones may need to be established for decision-points following which further milestones can be established. A focused project plan will be used to define and manage project milestones for independent oversight reform activities that do not involve changes to requirements or directives.

Interim project milestones may be changed as the project proceeds, with the approval of the responsible HSS lead and the Deputy Chief of Operations, HSS.

**Project Leadership:** The Deputy Secretary has tasked HSS with successfully accomplishing this reform effort. As such, Glenn Podonsky, Chief Health, Safety and Security Officer, and Bill Eckroade, Deputy Chief of Operations, HSS, have ultimate approval authority for activities within this project. The HSS Deputy Chief of Operations will serve as the overall integrator of the topical areas, will provide strategic direction, and resolve disagreements between the work areas. Within HSS, Steve Kirchhoff is the designated project manager, and is responsible for providing project information and for facilitating project accomplishment. Leadership of the various project elements will be accomplished by the responsible HSS managers based on the disciplines involved, as follows:

<u>HSS Lead</u>	<u>Topical Area(s)</u>
Pat Worthington (HS-10)	Worker Safety
Andy Lawrence (HS-20)	Nuclear Safety, Environmental, and Quality Assurance
Bill Roege (HS-30)	Operating Experience
John Boulden (HS-60)	Oversight and Enforcement
Larry Wilcher (HS-70)	Security
Andy Weston-Dawkes (HS-90)	Classification
Steve Kirchhoff (HS-1.2)	Process, Outreach, Project Management

Leadership by topical area managers is expected to promote a holistic approach for requirements framework within the various areas and to promote ownership by the staff members who will be assisting the line in achieving success in these areas.

**Project Resources:** HSS staff will serve as the primary resource for leading reform teams. Support from line organizations is needed in a variety of capacities: identifying streamlining opportunities (i.e., overly prescriptive and high-cost/low-value requirements), serving on ESCs, serving on Red-teams, serving on directive revision writing teams, reviewing draft directive revisions and proposed cancellations, and ultimately implementing reformed directives via contracts. Line stakeholder participation is essential for this reform to realize its objectives. The Department's senior leadership has authorized participation of senior managers and key staff from Headquarters and field organizations (see Attachment 1). Developing a solid project schedule with interim milestones is important to help all stakeholders to plan their work and

## **Project Management Plan**

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allocate their valuable resources. HSS topical area managers will review resource loading to ensure milestone schedules are realistic and resources are adequate.

**Project Management:** HSS will hold periodic project meetings of the topical area managers to review project completion, and to identify and resolve problems and impasses. HSS will prepare and publish monthly status reports on project performance. In addition, topical area managers will work in coordination with each other to resolve cross-cutting issues where requirements or guidance cross topical areas or subject matter lines. Performance challenges, including resource challenges and technical impasses, will be raised to HSS management and on to DOE senior leadership as needed to resolve problems and impasses.

**Root Cause and Actions to Prevent Recurrence:** Directives reform is being pursued to improve and strengthen the system of HSS directives in effectively and efficiently protecting workers, the public, and the environment. The need to reform the Department's safety and security directives is a reflection of conditions that existed over many years, long before the establishment of HSS, including the following:

- Changes in safety and security directives were often not made within a well-defined systems context.
- New safety and security directives, and changes to safety and security directives, were often made without a thorough understanding of existing conditions regarding field implementation and effectiveness.
- The system of safety and security directives was not actively managed such that the directives were up-to-date, accurate, and consistent.
- Infrastructure to facilitate active management of the safety and security directives did not exist.
- Implementation issues and problems caused by unclear, overlapping or redundant requirements were not well understood or appreciated by senior DOE officials.

To prevent recurrence of the need to perform a similar project in the future, an HSS-led team will be established to review the root causes of the current situation and develop recommendations for improvement.

**Defense Nuclear Facilities Safety Board:** The Defense Nuclear Facilities Safety Board (Board) provides oversight of the Department's defense nuclear facilities. The Board is required by its enabling statute to review DOE safety directives, and the Department's long-standing policy (see Order 251.1C) is to provide the Board with an opportunity to comment on draft directives prior to finalization. The Department is aware of the Board's keen interest in many of the directives and regulations under review. HSS has agreed to provide monthly briefings to the Board members on project plans, status, and results.

## **Project Management Plan DOE 2010 Safety and Security Reform**

Almost all of the safety directives in the scope of this review are of interest to the Board, with approximately three-fourths of the total HSS directive scope (see Attachment 2) of interest to the Board. The Department recognizes that the Board and its staff have extensive expertise and historical perspective that is valuable for effective requirements reform. The Department is committed to working with the Board and its staff to ensure that Board concerns are heard, understood, and considered. During a long history of directives revisions, the Department has almost always been able to resolve Board concerns or comments on proposed directives prior to their issuance. Effective interface with the Board is critical to the success of this project for programs and directives affecting defense nuclear facilities.

The Department will provide the Board with early opportunities to comment on proposed directive changes by consulting with the Board staff on directives of interest prior to HSS submittal of Justification Memorandums. In addition, the Board staff will be consulted as needed during directive development, particularly in cases where significant changes are being made or where changes impact prior commitments to the Board. The Board staff will be given an opportunity to review and comment on draft directives in parallel to the Red-team review at the end of the development phase, prior to initiating Department-wide review. As called for in DOE Order 251.1, the Board staff is routinely given an opportunity to review directives in parallel with both the Department-wide review and comment, and the final concurrence review.

Because the Board staff is expected to closely review draft revisions, and accompanying requirements tracking and basis documentation (e.g., cross-walks), HSS will clearly identify and provide the basis for any proposed directives revisions that change commitments previously made by the Department in response to Board recommendations or other correspondence.






**The Deputy Secretary of Energy**  
Washington, DC 20585

Project Management Plan  
DOE 2010 Safety and  
Security Reform  
Attachment 1

March 16, 2010

MEMORANDUM FOR KRISTINA M. JOHNSON, UNDER SECRETARY OF ENERGY  
STEVEN E. KOONIN, UNDER SECRETARY FOR SCIENCE  
THOMAS P. D'AGOSTINO, UNDER SECRETARY FOR  
NUCLEAR SECURITY  
GLENN S. PODONSKY, CHIEF HEALTH, SAFETY AND  
SECURITY OFFICER  
INGRID A. C. KOLB, DIRECTOR, OFFICE OF MANAGEMENT  
SCOTT BLAKE HARRIS, GENERAL COUNSEL

FROM: DANIEL B. PONEMAN   
SUBJECT: Department of Energy 2010 Safety and Security Reform Plan

The Department has recently developed the attached end-state vision for safety and security reform, which will guide our efforts to enhance productivity and achieve the Department's mission goals while maintaining the highest standards of safe and secure operations at Department of Energy facilities. It is imperative that we initiate the necessary actions quickly to attain this end state in 2010.

In 2009, the Office of Health, Safety and Security (HSS) began reforming its approach to enforcement and oversight by recognizing line management's responsibility for safety and security, reviewing opportunities for streamlining requirements, and eliminating directives that do not add value to safety and security. I have tasked HSS to continue this reform path, but they will need your input, cooperation and support. Therefore, please assure that senior managers and key staff from your Headquarters and field organizations are working closely with HSS to achieve our common goals.

The attached Plan outlines actions and milestones that require your attention. I recognize that this is a major effort and will involve the timely commitment of valuable resources, but your support, as well as input from the Defense Nuclear Facilities Safety Board and our stakeholders, is vital to our success.

Success will be measured through near-term relief from specific low-value burdensome requirements as well as longer-term streamlining of requirements that will lead to measurable productivity improvements. Please keep me informed of our progress and to alert me in a timely manner of any impasse that needs my attention.

Attachments



cc: Ines Triay, EM-1  
William Brinkman, SC-1  
Pete Miller, NE-1  
James Markowsky, FE-1  
Cathy Zoi, EE-1  
David Geiser, LM-1  
Mike Weis, PNSO, FMC Chair  
Jeff Smith, ORNL, Deputy Director  
Al Romig, SNL, Deputy Director  
Adam Cohen, PPPL, NLDC Executive Secretary

### **End-State Vision for Safety Reform**

To enhance productivity and achievement of mission goals, while maintaining the highest standards of safe operations at DOE facilities through the development, implementation, and assurance of effective, streamlined, and efficient safety policies and programs.

**Safety Performance:** Contractors are provided the flexibility to tailor and implement safety programs in light of their situation without excessive Federal oversight or overly prescriptive Departmental requirements.

**Safety Responsibilities:** To facilitate effective mission accomplishment, decision-making authorities are pushed to the lowest appropriate level of contractor and Federal management, considering hazards, risks, and performance history. Authority and accountability for safety rests with line management, including responsibility for and oversight.

**Safety Requirements:** DOE worker safety requirements are based upon existing national standards, with internally-derived requirements developed to address unique DOE conditions. DOE's regulatory requirements for occupational safety and health are founded on regulations promulgated by the Occupational Safety and Health Administration (OSHA), invoke current national standards to address outdated aspects of OSHA regulations, and establish or invoke requirements to address unique DOE workplace hazards. The Department's corporate approach for maintaining the highest standards of safe operations is promoted through its Integrated Safety Management Policy, DOE P 450.4, *Safety Management System Policy*, and implemented by contractors through Department of Energy Acquisition Regulation Clause 970.5223-1, *Integration of Environment, Safety and Health into Work Planning and Execution*.

**Safety Assurance:** The Department's contractors maintain an assurance system that provides reliable measurement of the effectiveness of their safety management systems and facilitates timely corrective actions to system or performance weaknesses.

**Regulatory Oversight and Enforcement:** HSS's approach to safety regulatory oversight and enforcement supports line management's efforts to affect the conduct and priorities of their contractors. Oversight is focused on safety performance. Oversight inspections and enforcement actions are prioritized for contractors with poor safety records and serious or recurring violations, and are consistent with approaches and penalties employed by OSHA and the Nuclear Regulatory Commission.

## End-State Vision for Security Reform

To enhance productivity and achievement of mission goals, while protecting sensitive information, technologies, and materials through the development, implementation, and assurance of effective, streamlined, and efficient security policies and programs.

**Security Performance:** Contractors are provided the flexibility to tailor and implement security programs in light of their situation and to develop corresponding risk- and performance-based protection strategies without excessive Federal oversight or overly-prescriptive Departmental requirements.

**Security Responsibilities:** To facilitate effective mission accomplishment, decision-making authorities are pushed to the lowest appropriate level of contractor and Federal management, considering vulnerabilities, risks, and performance history. Authority and accountability for security rests with line management, including responsibility for oversight.

**Security Requirements:** DOE security strategies are based upon legally mandated requirements, national standards developed by peer agencies, a rational threat assessment, and internally derived requirements developed to address unique DOE security risks. DOE-unique security requirements are streamlined, non-redundant, focused on desired performance outcomes, and tailored to specific mission and site risks. DOE security requirements are standardized where necessary to support interoperability and cost savings.

**Security Assurance:** The Department's contractors maintain an assurance system that provides reliable measurement of the effectiveness of their security programs and facilitates timely corrective actions to system or performance weaknesses.

**Regulatory Oversight and Enforcement:** HSS's approach to independent oversight and regulatory enforcement supports line management's efforts to affect the conduct and priorities of their contractors. Oversight is focused on security performance. Oversight inspections and enforcement actions are prioritized for contractors with serious or recurring violations of security requirements, with penalties commensurate with potential harm to national security and with those imposed by peer agencies.

## DOE 2010 SAFETY AND SECURITY REFORM PLAN

### Background

In 2009, the Office of Health, Safety and Security (HSS) began working to reform its enforcement and oversight approach, recognizing line management's significant responsibility for safety and security. To date, this approach has resulted in (1) increased coordination of enforcement actions with line management, (2) working with the Field Management Council (FMC) to understand where reform in its oversight and enforcement practices is needed, (3) suspending independent oversight of low-hazard operations and lower-value security assets, except for those cases where site performance requires increased attention, and (4) maintaining rigorous and informed oversight of high-hazard operations or high-value security assets.

In November 2009, following the safety and security reform studies directed by the Deputy Secretary, HSS began a disciplined review of all HSS directives, including a systematic review of the Department of Energy safety and security regulatory model (which includes both DOE directives and regulations). As a result, HSS identified 24 directives for potential cancellation (subject to consultation with the Program Offices, including the Central Technical Authorities). HSS has also developed approaches for safety and security disciplines that are expected to result in more than a 50 percent reduction in the number of existing safety and security directives for which HSS is the Office of Primary Interest.

### Priority Actions and Milestones

The Department is setting the following safety and security reform goals and target milestones. The Department leadership team expects senior managers of Headquarters and field organizations actively to support these challenging efforts. Specifically, leadership of each Headquarters and field organization will need to ensure the timely and efficient engagement of appropriate managers and staff at all levels of the organization as needed to support HSS in achieving the actions listed below.

Action	Milestones
<b>Process:</b> Initiate directives process changes to support the pace of this reform effort and require a rapid (3-day) escalation for impasse (veto) resolution.	March 2010
<b>Outreach:</b> Develop an outreach plan that will engage, inform and enlist the support of DOE internal and external stakeholders, (including the Defense Nuclear Facilities Safety Board) throughout this reform effort to achieve our end-state vision. Outreach includes a roundtable discussion with the Deputy Secretary, Under Secretaries, and various worker unions in March.	March 2010
<b>Security Near-term:</b> Provide relief from specific burdensome security	March 2010

requirements by: 1) finalizing approval of the revised Unclassified Controlled Nuclear Information Order, 2) issuing a policy memorandum on Foreign Visits and Assignment, and 3) submitting a revised Accountable Classified Removable Electronic Media (ACREM) policy for Departmental review.	
<b>Near-term cancellations:</b> Initiate the Departmental review process to cancel the unneeded directives with the goal of completing the cancellations in April.	March 2010
<b>Oversight and Enforcement:</b> Redefine the HSS independent oversight and regulatory enforcement functions to achieve the end-state vision to include submitting a revision of DOE Order 470.2B, Independent Oversight and Performance Assurance Program for Departmental review.	May 2010
<b>Worker Safety:</b> Streamline the Department's worker health and safety, Integrated Safety Management, and Oversight directives for submittal for Departmental review. Pursue further identification of issues with the Department's worker safety regulations, 10 CFR 851 (that will then be evaluated through the rule making process).	May 2010
<b>Classification:</b> Streamline the Department's classification and information control directives within 90 days following the publication of the pending executive order (E.O.) for Controlled Unclassified Information and the President's Information Security Oversight Office (ISOO) implementing directives for E.O. 13526, Classified National Security Information.	Milestones based on the issuance of the E.O.
<b>Environmental Management:</b> Integrate the Department's environmental management and energy management directives, including adoption of ISO 14001 as the Department's standard for environmental management and the requirements of E.O. 13514 into one order for submittal for Departmental review by April. Also, due to the benefits achieved from Departmental review already conducted, complete the revision and issuance of the Radiation Protection of the Public and the Environment Order (DOE O 458.1) as scheduled in July.	July 2010, with interim milestones in April as specified
<b>Quality Assurance:</b> Streamline the Department's Quality Assurance directives for submittal for Departmental review.	July 2010
<b>Operating Experience:</b> Streamline the Department's operational experience and feedback directives into an integrated operational awareness and risk management approach for submittal for Departmental review.	August 2010
<b>Nuclear Safety:</b> Recognizing the importance of the Department's nuclear safety regulations and directives, a review will be conducted to clarify the existing relationship between regulation- and directive-driven requirements, address any identified gaps in requirements, and reduce unnecessary burden where there is no commensurate safety benefit. The review will be completed and the revised directives will be submitted for Departmental review by September. As part of this effort, the Defense	September 2010, with interim milestones in May as specified

<p>Nuclear Facility Safety Board will be consulted. Also, due to the benefits achieved from Departmental review already conducted, complete the revision and issuance of the four nuclear safety orders currently in Departmental review (DOE O 425.1D, DOE O 433.1B, DOE O 422.X, and DOE O 426.Y) as scheduled in May.</p>	
<p><b>Security:</b> Streamline the Department's safeguards and security directives by leveraging the National Nuclear Security Administration Zero-Based Security Review (ZBSR) to update all related Departmental directives, by October, including submitting a revised Safeguards and Security policy for Departmental review in March and the updated Safeguards and Security Program order for Departmental review in June.</p>	<p>October 2010, with interim milestones in March and June as specified</p>

# Project Management Plan

## DOE 2010 Safety and Security Reform

### Attachment 2

#### SCOPE OF HSS DIRECTIVES

The following listing provides the current set of HSS directives that will be considered by this Project Management Plan, grouped by topical area. For some of these directives, revisions have recently been completed and no additional near-term actions are needed. For others, no action (revision or cancellation) may be necessary during 2010, based on the requirements framework analysis and stakeholder inputs. DOE Order 251.1C calls for review of each DOE directive and either certification or revision every four years. This listing does not include all potential elements in the associated requirements frameworks, which also may include rules, regulations, and technical standards.

#### Topical Area: Worker Safety

- DOE P 226.1A, Department of Energy Oversight Policy (05/25/2007)
- DOE P 411.1, Safety Management Functions, Responsibilities, and Authorities Policy (01/28/1997)
- DOE P 426.1, Federal Technical Capability Policy for Defense Nuclear Facilities (12/10/1998)
- DOE P 434.1, Conduct and Approval of Select Agent and Toxin Work at Department of Energy Sites (06/05/2009)
- DOE P 441.1, DOE Radiological Health and Safety Policy (04/26/1996)
- DOE P 450.2A, Identifying, Implementing and Complying with Environment, Safety and Health Requirements (05/15/1996)
- DOE P 450.3, Authorizing Use of the Necessary and Sufficient Process for Standards-Based Environment, Safety and Health (01/25/1996)
- DOE P 450.4, Safety Management System Policy (10/15/1996)
- DOE P 450.7, Environment, Safety and Health (ESH) Goals (08/02/2004)
- DOE P 456.1, Secretarial Policy Statement on Nanoscale Safety (09/15/2005)
- DOE O 226.1A, Implementation of Department of Energy Oversight Policy (07/31/2007)
- DOE O 440.1B, Worker Protection Program for DOE (Including the National Nuclear Security Administration) Federal Employees (05/17/2007)
- DOE M 411.1-1C, Safety Management Functions, Responsibilities, and Authorities Manual (12/31/2003)
- DOE O 426.1, Federal Technical Capability (11/20/2009)
- DOE M 440.1-1A, DOE Explosives Safety Manual (01/09/2006)
- DOE M 450.3-1, DOE Closure Process for Necessary and Sufficient Sets of Standards (01/25/1996)
- DOE M 450.4-1, Integrated Safety Management System Manual (11/01/2006)
- DOE N 456.1, The Safe Handling of Unbound Engineered Nanoparticles (01/05/2009)
- DOE G 440.1-1A, Worker Protection Program for DOE (including the National Nuclear Security Administration) Federal Employees Guide for Use with DOE O 440.1B (06/04/2007)
- DOE G 440.1-2, Construction Safety Management Guide For Use With DOE Order 440.1 (06/26/1997)
- DOE G 440.1-3, Occupational Exposure Assessment (03/30/1998)
- DOE G 440.1-4, Contractor Occupational Medical Program Guide For Use With DOE Order 440.1 (06/26/1997)



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- DOE G 440.1-7A, Implementation Guide for use with 10 CFR Part 850, Chronic Beryllium Disease Prevention Program (01/04/2001)
- DOE G 440.1-8, Implementation Guide for Use with 10 CFR Part 851, Worker Safety and Health Programs (12/27/2006)
- DOE G 441.1-1C, Radiation Protection Programs Guide for Use with Title 10 CFR Part 835, Occupational Radiation Protection (05/19/2008)
- DOE G 450.3-1, Documentation for Work Smart Standards Applications: Characteristics and Considerations (02/01/1997)
- DOE G 450.3-2, Attributes of Effective Implementation (02/01/1997)
- DOE G 450.3-3, Tailoring for Integrated Safety Management Applications (02/01/1997)
- DOE G 450.4-1B, Integrated Safety Management System Guide (Volumes 1 & 2) for use with Safety Management System Policies (DOE P 450.4, DOE P 450.5, and DOE P 450.6); The Functions, Responsibilities, and Authorities Manual; and the DOE Acquisition Regulation (03/01/2001)

### Topical Area: Nuclear Safety, Environmental, and Quality Assurance

- SEN-35-91, Nuclear Safety Policy (09/09/1991)
- DOE P 410.1A, Promulgating Nuclear Safety Requirements (05/15/1996)
- DOE P 442.1, Differing Professional Opinions on Technical Issues (11/16/2006)
- DOE O 252.1, Technical Standards Program (11/19/1999)
- DOE O 420.1B Chg 1, Facility Safety (04/19/2010)
- DOE O 425.1D, Verification of Readiness to Start Up or Restart Nuclear Facilities (04/16/2010)
- DOE O 426.2, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities (04/21/2010)
- DOE O 433.1B, Maintenance Management Program for DOE Nuclear Facilities (04/21/2010)
- DOE O 5480.19 Chg 2, Conduct of Operations Requirements for DOE Facilities (10/23/2001)
- DOE O 5480.30 Chg 1, Nuclear Reactor Safety Design Criteria (01/19/1993)
- DOE M 441.1-1, Nuclear Material Packaging Manual (03/07/2008)
- DOE M 442.1-1, Differing Professional Opinions Manual for Technical Issues (11/16/2006)
- DOE G 252.1-1, Technical Standards Program Guide (11/19/1999)
- DOE G 420.1-1, Nonreactor Nuclear Safety Design Criteria and Explosive Safety Criteria Guide for use with DOE O 420.1 Facility Safety (03/28/2000)
- DOE G 420.1-2, Guide for the Mitigation of Natural Phenomena Hazards for DOE Nuclear Facilities and Non-Nuclear Facilities (03/28/2000)
- DOE G 420.1-3, Implementation Guide for DOE Fire Protection and Emergency Services Programs for Use with DOE O 420.1B, Facility Safety (09/27/2007)
- DOE G 421.1-1, DOE Good Practices Guide Criticality Safety Good Practices Program Guide for DOE Nonreactor Nuclear Facilities (8/25/1999)
- DOE G 421.1-2, Implementation Guide For Use in Developing Documented Safety Analyses To Meet Subpart B Of 10 CFR 830 (10/24/2001)
- DOE G 423.1-1, Implementation Guide For Use In Developing Technical Safety Requirements (10/24/2001)
- DOE G 424.1-1B, Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements (4/08/2010)
- DOE G 433.1-1, Nuclear Facility Maintenance Management Program Guide for Use with DOE O 433.1 (09/05/2001)

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- DOE P 141.1, Department of Energy Management of Cultural Resources (05/02/2001)
- DOE P 454.1, Use of Institutional Controls (04/09/2003)
- DOE O 450.1A, Environmental Protection Program (06/04/2008)
- DOE O 5400.5 Chg 2, Radiation Protection of the Public and the Environment (01/07/1993)
- DOE G 450.1-1A, Implementation Guide for Use with DOE O 450.1, Environmental Protection Program (10/24/2005)
- DOE G 450.1-2, Implementation Guide for Integrating Environmental Management Systems into Integrated Safety Management Systems (08/20/2004)
- DOE G 450.1-3, Environmental Guidelines for Development of Cultural Resource Management Plans-Update (CANCELLED BY N 251.82 on 06/02/2010)
- DOE G 450.1-4, Implementation Guide, Wildland Fire Management Program for Use with DOE O 450.1, Environmental Protection Program (CANCELLED BY N 251.82 on 06/02/2010)
- DOE G 450.1-5, Implementation Guide for Integrating Pollution Prevention into Environmental Management Systems (CANCELLED BY N 251.82 on 06/02/2010)
- DOE G 450.1-6, Ground Water Surveillance Monitoring Implementation Guide for Use with DOE O 450.1, Environmental Protection Program (CANCELLED BY N 251.82 on 06/02/2010)
- DOE G 450.1-9, Ground Water Protection Programs Implementation Guide for Use with DOE O 450.1, Environmental Protection Program (CANCELLED BY N 251.82 on 06/02/2010)
- DOE G 450.1-10, Senior Manager Implementation Guide for Use with DOE O 450.1, Environmental Protection Program (CANCELLED BY N 251.82 on 06/02/2010)
- DOE G 454.1-1, Institutional Controls Implementation Guide for Use with DOE P 454.1, Use of Institutional Controls (10/14/2005)
- DOE O 414.1C, Quality Assurance (06/17/2005)
- DOE G 414.1-1B, Management and Independent Assessments Guide for Use with 10 CFR Part 830, Subpart A, and DOE O 414.1C, Quality Assurance; DOE M 450.4-1, Integrated Safety Management System Manual; and DOE O 226.1A, Implementation of Department of Energy Oversight Policy (09/27/2007)
- DOE G 414.1-2A, Quality Assurance Management System Guide for Use with 10 CFR 830 Subpart A, Quality Assurance Requirements, and DOE O 414.1C, Quality Assurance (06/17/2005)
- DOE G 414.1-3, Suspect/Counterfeit Items Guide for Use with 10 CFR 830 Subpart A, Quality Assurance Requirements, and DOE O 414.1B, Quality Assurance (11/03/2004)
- DOE G 414.1-4, Safety Software Guide for Use with 10 CFR 830, Subpart A, Quality Assurance Requirements, and DOE O 414.1C, Quality Assurance (06/17/2005)
- DOE G 414.1-5, Corrective Action Program Guide (03/02/2006)

### Topical Area: Operating Experience

- DOE O 210.2, DOE Corporate Operating Experience Program (06/12/2006)
- DOE O 225.1A, Accident Investigations (11/26/1997)
- DOE O 231.1A Chg 1, Environment, Safety and Health Reporting (06/03/2004)
- DOE M 231.1-1A Chg 2, Environment, Safety and Health Reporting Manual (03/19/2004)
- DOE M 231.1-2, Occurrence Reporting and Processing of Operations Information (08/19/2003)
- DOE G 225.1A-1, Implementation Guide for use with DOE O 225.1 Accident Investigations (11/26/1997)
- DOE G 231.1-1, Occurrence Reporting and Performance Analysis Guide (08/20/2003)
- DOE G 231.1-2, Occurrence Reporting Causal Analysis Guide (08/20/2003)

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- DOE M 140.1-1B, Interface With The Defense Nuclear Facilities Safety Board (03/30/2001)

### Topical Area: Oversight and Enforcement

- DOE O 470.2B, Independent Oversight and Performance Assurance Program (10/31/2002)
- DOE G 226.1-1, Safeguards and Security Oversight and Assessments Implementation Guide (CANCELLED BY N 251.80 on 06/02/2010)

### Topical Area: Security

- DOE P 470.1, Integrated Safeguards and Security Management (ISSM) Policy (05/08/2001)
- DOE N 206.4, Personal Identity Verification (06/29/2007)
- DOE N 234.1, Reporting of Radioactive Sealed Sources (02/27/2008)
- DOE N 470.4, Reciprocal Recognition of Existing Personnel Security Clearances/Access Authorizations (01/09/2009)
- DOE N 470.5, Implementation of Section 1072 of the National Defense Authorization Act for Fiscal Year 2008 (8/12/2009)
- DOE O 142.1, Classified Visits Involving Foreign Nationals (01/13/2004)
- DOE O 142.3, Unclassified Foreign Visits and Assignments (06/18/2004)
- DOE O 470.3B, Graded Security Protection (GSP) Policy (08/12/2008)
- DOE O 470.4A, Safeguards and Security Program (05/25/2007)
- DOE M 470.4-1 Chg 1, Safeguards and Security Program Planning and Management (08/26/2005)
- DOE M 470.4-2A, Physical Protection (07/23/2009)
- DOE M 470.4-3A, Contractor Protective Force (11/05/2008)
- DOE M 470.4-4A, Information Security Manual (01/16/2009)
- DOE M 470.4-5, Personnel Security (08/26/2005)
- DOE M 470.4-6 Chg 1, Nuclear Material Control and Accountability (08/26/2005)
- DOE M 470.4-7, Safeguards and Security Program References (08/26/2005)
- DOE M 470.4-8, Federal Protective Force (07/15/2009)
- DOE M 471.2-3B, Special Access Program Policies, Responsibilities, and Procedures (07/11/2002)
- DOE G 470.4-1, Asset Protection Analysis Guide (CANCELLED BY N 251.80 on 06/02/2010)
- DOE G 473.2-1, Guide for Establishment of a Contingency Protective Force (CANCELLED BY N 251.80 on 06/02/2010)

### Topical Area: Classification

- DOE O 471.1B, Identification and Protection of Unclassified Controlled Nuclear Information (03/01/2010)
- DOE O 471.3, Identifying and Protecting Official Use Only Information (04/09/2003)
- DOE O 475.2, Identifying Classified Information (08/28/2007)
- DOE M 471.1-1 Chg 1, Identification and Protection of Unclassified Controlled Nuclear Information Manual (CANCELLED by O 471.1B on 03/01/2010)
- DOE M 471.3-1, Manual for Identifying and Protecting Official Use Only Information (04/09/2003)
- DOE M 475.1-1B, Manual for Identifying Classified Information (08/28/2007)
- DOE G 471.3-1, Guide to Identifying Official Use Only Information (CANCELLED by N 251.81 on 06/02/2010)

**Project Management Plan  
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**Attachment 3  
CHECKLIST FOR DIRECTIVES REFORM**

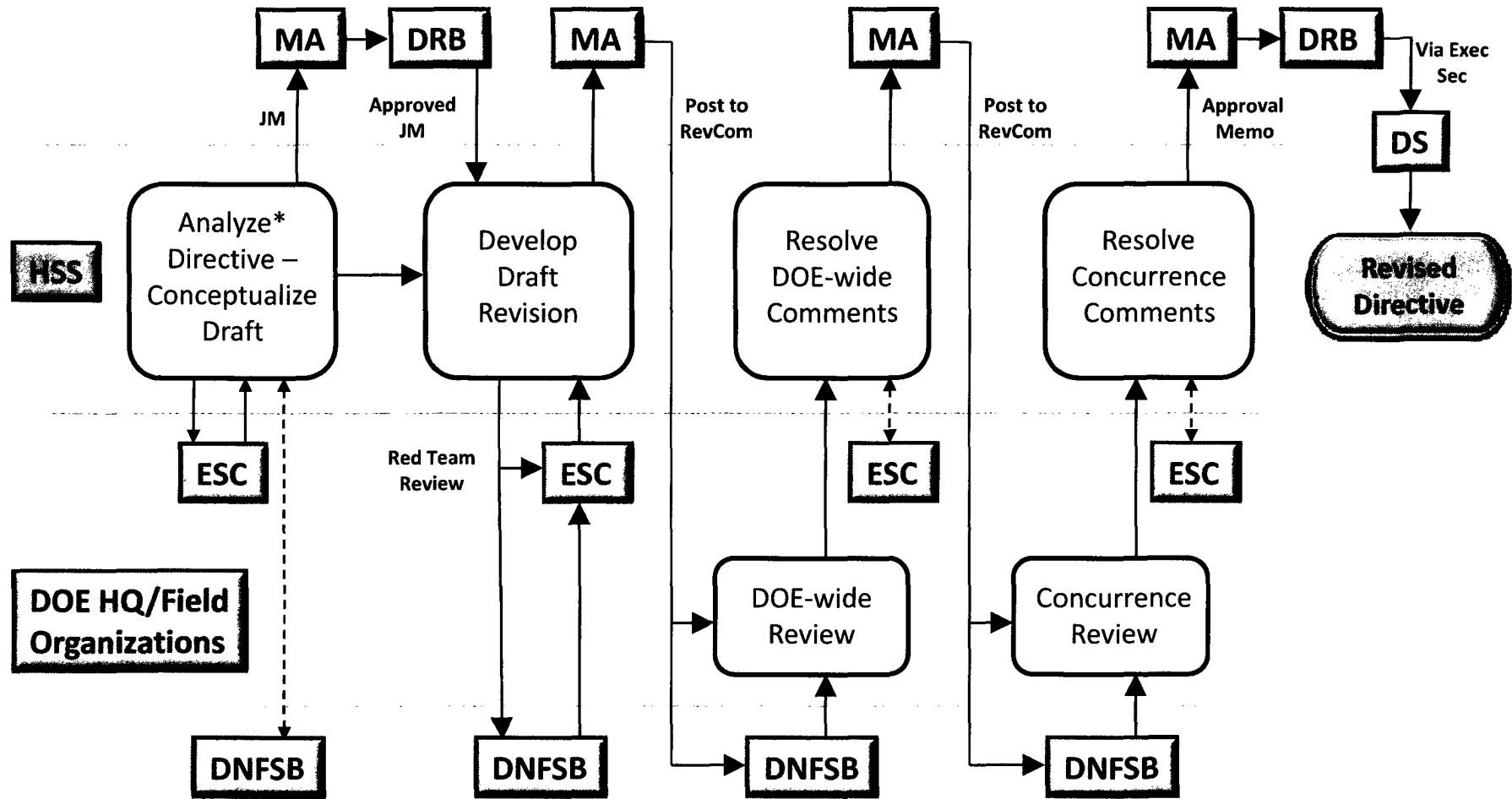
1. **TECHNICAL BASES** – Has the basis for all requirements as well as the basis for any changes been documented?
2. **ADEQUATE PROTECTION** – Do the requirements in the directive provide adequate protection for the workers, public, environment?
3. **ESSENTIAL METHOD** – Are the methods described necessary for adequate protection? Are non-essential elements removed?
4. **SYSTEMS APPROACH** – Does this directive have clear and appropriate interfaces with other related directives?
5. **UNIQUENESS** – Is this directive uniquely required? Has combination with other directives or movement outside the directives system been considered and decided against? Have duplications and inconsistencies with laws, regulations, other directives, and invoked standards been identified and resolved?
6. **EXTERNAL STANDARDS** – Were external consensus standards evaluated and incorporated to the extent applicable and appropriate?
7. **ANALYZED IMPACTS** – Have we considered potential unintended consequences of the changes?
8. **FLEXIBILITY** – Does this directive provide flexibility without increasing health, safety or security risk? Is the level of prescription appropriate?
9. **IMPLEMENTABLE** – Are the requirements clear and capable of being implemented? Requires stakeholder, program and field input and perspective.
10. **COMMITMENT CONTINUITY** – Were commitments identified, evaluated and re-negotiated as needed? Were commitments to the DNFSB, GAO, IG and other organizations thoroughly evaluated and addressed?
11. **RELEVANCE** – Does the directive continue to serve a necessary purpose?
12. **STAKEHOLDER ENGAGEMENT** – Has line management, DNFSB and stakeholder input been solicited and adequately considered for the items above?

**Project Management Plan  
DOE 2010 Safety and Security Reform**

**Attachment 4  
Lessons Learned from January 2008 Safety Directives Project**

<b><u>Lessons Learned</u></b>	<b><u>How Incorporated into this Plan</u></b>
Effective practice: Cross-disciplinary teams to develop revisions	Sustained. While cross-disciplinary writing teams are encouraged, not required, stakeholder participation in conceptualizing, developing, and reviewing directive revisions is established as a project control.
Effective practice: Requirements crosswalks	Sustained. Requirements crosswalks established as a project control.
Effective practice: Red-teams (independent, management level reviews)	Sustained. Independent review is established as a project control; this will be done by the ESCs or their designees.
Effective practice: Grouping of similar directives to be worked together	Sustained. Groupings based on disciplines, under leadership by responsible HSS manager. HSS management-systems directives coordination will be accomplished through HSS project management meetings.
Effective practice: Interface with the Defense Nuclear Facilities Safety Board staff	Sustained. The HSS project manager, supported by the Departmental Representative, will continue coordination of this important interface.
Challenging factor: Lack of clear and steady directives process	Resolved. DOE Order 251.1C was issued in January 2009 and MA and the DRB now have over 1 year of experience.
Challenging factor: Lack of certainty in DOE administration	Resolved. The new DOE administration is in place and has clearly endorsed the current reform plan.
Challenging factor: HSS management focus	Resolved. The March 2010 reform plan clearly engages HSS leaders; HSS level-1 managers are assigned leadership of identified topic areas.
Challenging factor: Not getting stakeholder management buy-in early on scope of revisions	Resolved. ESCs and approval of JMs (required by 251) are intended to facilitate early line management buy-in on scope of revisions.
Challenging factor: Not holding writing teams and Red-teams accountable to schedules.	Resolved. HSS has clear responsibility to get directive revisions/cancellations developed for Department-wide review. HSS will track project performance and hold HSS team leaders accountable.
Challenging factor: Not promptly elevating impasses	Resolved. The Deputy Secretary has communicated that impasses must be elevated promptly (see Attachment 1).

# HSS Directives Process (for Revised Directives)



\* Within the context of a Systems-Wide Approach for each topical area that provides the appropriate standards of protection while eliminating duplication and conflicting requirements.

**CONCEPTUALIZE → DEVELOP → REVIEW → CONCUR → APPROVE**

**Project Management Plan  
DOE 2010 Safety and Security Reform**

**Attachment 6  
Sample Timeline for Revising Directives**

Conceptualize

- Day 0 Initiate revision – need to define major changes to be accomplished – consult with ESC, Board staff, and other stakeholders.
- Day 21 Provide draft Justification Memo (JM) to HS-1 for approval
- Day 28 HS approval of JM; provide to MA
- Day 29 MA schedules DRB meeting (within 13-27 days) and releases JM for DRB review
- Day 42 DRB meeting (every other Thursday) – approval of JM – “standard” development time is targeted at 60 days (more time will typically be needed)

Develop

- Day 102 Complete initial development of draft revision (and crosswalk); provide for parallel ESC review, Board staff review, HSS internal review (to be provided via the ESC), and MA editorial review (30 days for reviews)
- Day 132 Review comments provided by ESC review, Board staff review, and MA editorial review; initiate comment resolution (30 days for comment resolution)
- Day 162 Provide draft revision to MA for release for Department-wide review

Review

- Day 169 MA releases revised directive for Department-wide review (via RevCom for Orders and Guides, with typical review schedule of 45 days; via DRB coordination for Policies, with typical review schedule of 15-30 days)
- Day 214 Department-wide review comments received; Comment resolutions typically due in 30-45 days based on JM/DRB direction (may be shorter for Policies)
- Day 259 Comment resolutions and concurrence revision due to MA for release for Department-wide review (via RevCom for Orders and Guides)

Concur

- Day 266 MA releases concurrence draft for Department-wide review (typical schedule is 10-14 days)
- Day 280 Concurrences due; Non-concurrences need to be resolved, if possible

Approve

- Day 294 If no non-concurrences received, provide final version ready for signature along with Approval Memo (AM) for HS-1 approval.
- Day 303 HS-1 approval of AM; provide to MA for scheduling of final DRB meeting in 15-29 days
- Day 308 MA confirms final version is signature-ready; releases it for final DRB review; schedules DRB meeting
- Day 322 Final DRB review; prepare package for approval by the Deputy Secretary
- Day 336 Final approval and release via Directives web-site.