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# **Using ISMS Principles and Functions in Developing an ARRA Readiness Review Process**

**Presented by  
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## Bio for Linda K. Rogers

- Ms. Rogers has over thirty years of nuclear experience, spanning: Environmental Management, Safety & Health, Radiological Protection and Controls, Emergency Management, Security, Construction, Project Controls, Quality Assurance, Quality Control, Waste Characterization and Shipping at both commercial nuclear power and DOE facilities. Linda holds a Master's Degree in Project Management and Training. In 2006, she joined the BJC Quality Assurance Department as the Assessments and Readiness Programs Manager.
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**Expectations for ARRA funded work  
Established by DOE Acting Assistant Secretary  
for Environmental Management:**

**“Poor safety performance due to inadequate safety infrastructure...or lack of work planning will not be tolerated.”**

**“... contractors establish and implement a self-assessment process that would provide a high level of assurance that any new or significantly increased work load under the ARRA is demonstrably ready...prior to conducting work.”**

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## The CHALLENGE!

- **Must focus on Safety and Compliance together.**
- **How to implement a rigorous review process, ensuring Safety and Compliance, without unduly impacting the project's ability to perform work.**

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# ISMS Principle 1: Line Management Responsibility for Safety

- **What documents, procedures, processes, approvals, training, equipment, support must a prudent Project Manager have in place to ensure Safety and Compliance prior to starting work?**
- **How can this information be captured to demonstrate Readiness, in a transparent, rigorous, documentable, and auditable process?**

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## A CHECKLIST IS BORN

- **A Checklist Format was developed to identify:**
  - **Project Specific Requirements**
  - **Documentation of Compliance**
  - **Verification of Documentation**
- **Subject Matter Experts (SME) developed List of Common Requirements for Project Startup**

## ARRA Readiness Checklist

Facility:  
Activity/Phase Title:

Activity/Phase Description:

Directions: Check "Yes" if the item is applicable to the activity/phase being reviewed for startup. Then provide in the Action/Documentation Section the information/documentation to be used as evidence that the risk has been appropriately addressed. If the Impact Area does not apply to the phase being reviewed then check "No".

Item No:	Impact Area		Requirements	Action/Documentation	Verified Complete and Accurate
	Yes	No			
<b>1</b>			<b>ENVIRONMENTAL SAFETY &amp; HEALTH</b>		
1.1			Fire Protection		
1.2			Occupational Safety		
1.3			Industrial Hygiene		
1.4			Environmental Compliance and Protection		
1.5			Radiological Control		
<b>2</b>			<b>SAFETY BASIS IMPLEMENTATION</b>		
<b>3</b>			<b>MANAGEMENT</b>		
<b>4</b>			<b>TRAINING</b>		
<b>5</b>			<b>OPERATIONS/CONDUCT OF OPERATIONS</b>		
<b>6</b>			<b>WORK CONTROL</b>		
<b>7</b>			<b>QUALITY ASSURANCE</b>		
<b>8</b>			<b>CONSTRUCTION</b>		
<b>9</b>			<b>CONTRACTS</b>		
<b>10</b>			<b>NMC&amp;A/SECURITY</b>		
<b>11</b>			<b>WASTE MANAGEMENT/ PACKAGING &amp; TRANSPORTATION</b>		
11.1			Waste Handling Plan approved		
11.2			Waste Coordinator has been assigned to the project		
11.3			Waste Control Plan approved		
11.4			Sampling And Analysis Plan Approved		
<b>12</b>			<b>EMERGENCY MANAGEMENT</b>		
<b>13</b>			<b>Additional Project Specific Requirements</b>		

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## Documentable and Auditable Process:

- **Checklist establishes Evidence File requirements**
- **Documentation verifies:**
  - **Work Scope Identified**
  - **Hazards Analyzed**
  - **Hazard Controls Developed and Implemented**
  - **Ready to Perform Work Within Controls**
  - **Feedback and Improvement Process in Place**
- **Auditable Records would be maintained by Readiness Organization**

# VICTORY!

- **Procedure and Checklist issued**
- **ARRA Funding Received for Six (6) BJC Projects:**
  - **Preparation for Demolition of K-27 Facility**
  - **Building two (2) LLW Disposal Cells**
  - **Removal of an Underground Tank**
  - **Sampling and Removal of Underground Pipeline**
  - **Installation of twenty (20) monitoring wells**
  - **Expansion of a Sanitary Landfill**

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## Building Readiness Reviews into Project Schedules

- **Project Managers develop detailed Project Schedules**
- **Schedule reviewed for Identification of Triggers requiring ARRA Reviews**
  - **New Subcontractor**
  - **New Activity within the Project**
- **Readiness Reviews included in detailed Project Schedules**

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## Role of Readiness Specialists

- **One Assigned to each Project**
- **Track Completion of Project Documentation**
  - **Track document status**
  - **Review Documents for completeness and accuracy**
  - **Assemble completed documents into Evidence Files and update Checklist**
  - **Work with Project Manager to Identify and Correct Deficiencies**

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## Declaration of Readiness to Perform Work

- **Project Manager determines when Project is Ready to Perform Work**
- **Readiness Specialist verifies Documentation of Checklist Requirements completed**
- **Readiness Manager conducts Independent Review of Documentation and Approves convening Senior Project Review Committee**
- **Approval of Senior Project Review Committee Chairman is Authorization Authority for Startup**

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## Completed Reviews

- **Two Readiness Reviews completed on Low Level Waste Disposal Cells**
  - Initial Site Preparation
  - Berm and Road Construction
  
- **One Review completed on K-27 Pre-Demolition Preparation**

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## Lessons Learned

- **Communicate, Communicate, Communicate.....**
- **More Readiness Reviews required than originally anticipated –  
K-27 Pre-Demolition Preparation**
- **Final Product is a clear, concise, auditable record that will support the project's readiness to start work safely and compliantly**

## Final Note

- **On July 2, 2009 DOE-EM issued: *Project Safety Oversight and the Recovery Act Readiness Evaluation (RARE) Process***
- **Objective: “This plan establishes the process by which the Department of Energy, Office of Environmental Management shall perform Recovery Act Readiness Evaluations (RARE) in support of projects identified within the scope of the ARRA of 2009”**

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## Final Note

- **The Checklist within the plan is based on the same ARRA Readiness Checklist presented here today.**