

ISMS IMPLEMENTATION (CONTRACTS)

OBJECTIVE

ISMS.2: Requirements from the Department of Energy Acquisition Regulations (DEAR) for the Integrated Safety Management (ISM) clause and the laws, regulations, and DOE directives clause are implemented and effective. These include requirements for ISM System Descriptions, annual updates, List A/B, and requirements flowdown. Central Technical Authority (CTA) concurrence requirements are implemented

CRITERIA

1. NNSA Site Office procedures and mechanisms ensure that contracts establish clear expectations and performance measures (DEAR; DOE P 450.4).
2. NNSA Site Office procedures and mechanisms ensure that the annual update of the ISM System Description and the annual submittal of performance objectives, performance measures, and commitments are submitted by the contractor and approved by the NNSA Site Office, as required by the DEAR (DEAR, DOE M 450.4-1, NA-1 SD 411.1-1C.).
3. The NNSA Site Office has procedures and mechanisms in place directing the contractor to propose and maintain facility- or activity-specific standards tailored to the work and the hazards. Procedures require that appropriate safety requirements in necessary functional areas are included in contracts and appropriate documentation of any tailoring is maintained. Central Technical Authority (CTA) concurrence is obtained as required (DEAR; DOE P 450.4, DOE O 410.1, NA-1 M 410.1, BOP-003.0507).
4. NNSA Site Office procedures and mechanisms are in place to assess the process used to flow down contract requirements into site procedures and mechanisms and ensure that hazards mitigation programs and controls are implemented (DOE O 226.1A; NA-1 SD 226.1A DOE O 410.1, NA-1 M 410.1).
5. The budget process ensures that adequate resources are provided to implement effective nuclear safety management programs (NA-1 SD 411.1-1C' BOP-003.0304, BOP-003.0507).
6. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-assessments) have been appropriately resolved, corrective actions have been completed and are adequate, or a clear path to completion is indicated (DOE O 226.1A; NA-1 SD 226.1A).
7. The Site Office has sufficient staff, and assigned personnel have adequate technical competence, to oversee the performance of the contractor in this functional area (NA-1 SD 411.1-1C).

APPROACH

References:

- 10 CFR 830, *Nuclear Safety Management*
- DEAR
- DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*
- DOE O 410.1, *Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*
- DOE G 450.4-1A, *Integrated Safety Management System Guide (Volume 1) for Use with Safety Management System Policies (DOE P 450.4, DOE P 226.1, and DOE P 450.6)*
- DOE P 450.4, *Safety Management System Policy*
- DOE M 450.4-1, *Integrated Safety Management System Manual*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM)*
- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*
- NA-1 M 410.1, *Implementation of National Nuclear Security Administration Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*
- NNSA Policy Letter BOP-003.0304, *NNSA Headquarters Approval of Contracts Actions Process (CAP)*
- NNSA Policy Letter BOP-003.0507, *M&O Contract Administration Guides (CAGs)*

Record Review:

- With particular emphasis on nuclear safety requirements and processes, review the NNSA Site Office field budget guidance to determine if sufficient information has been provided to the contractor on mission changes as related to safety performance objectives, measures, and commitments.
- Review Site Office mechanisms for oversight of the identification and maintenance of standards and processes to flow contract standards into site implementing mechanisms including documentation of justification of the treatment of nuclear safety directives where tailoring processes are used (as discussed on DOE O 410.1).
- Review the annual contractor submittal of performance objectives, performance measures, and commitments and assess the process to approve this submittal. Review the status of the contractor's submission of the ISM System Description, the status of any revisions and the evaluation of effectiveness of the ISMS.

Interviews:

- Interview the NNSA Site Office budget managers and the Contracting Officer to determine if processes for the establishment of performance objectives, performance measures, and commitments are being used effectively.
- Interview Site Office staff personnel responsible for approving the ISMS System Description and any revisions made or contemplated. Interview selected NNSA Site Office personnel

responsible for selecting standards to assess their understanding of the procedures and the underlying principles and requirements.

Observations:

- Observe interactions that may occur between the contractor and the NNSA Site Office staff or line managers concerning performance measures or ISM System Description updates.
- Observe interactions between NNSA Site Office personnel and the contractor related to the effective establishment of standards and controls.