

ISMS IMPLEMENTATION (FRAM)

OBJECTIVE

ISMS.1: The NNSA Site Office has established and documented how the specific functions and responsibilities assigned to the NNSA Site Office in the *NNSA Safety Management Functions, Responsibilities, and Authorities Manual (FRAM)* are properly discharged.

CRITERIA

1. NNSA Site Office FRAM document, and implementing procedures and mechanisms describe, the organization and its line management and capture assigned safety management functions and responsibilities. Roles and responsibilities are clearly defined, and line managers are responsible for safety (NNSA FRAM, DOE P 450.4).
2. NNSA Site Office FRAM document and implementing procedures capture all assigned authorities and provide a breakdown of applicable functions contained in the NNSA FRAM. The Site Office FRAM clearly identifies any authority that has been transferred to or from other organizations (NNSA FRAM).
3. The NNSA Site Office FRAM document is approved by NA-10. Implementing procedures and mechanisms ensure that the FRAM and all implementing process documentation are prepared and managed by a change control process and that the organizational element or position responsible for maintaining the document and its interfaces with other organizations is identified (NNSA FRAM).
4. Site Office procedures define the required staff and skills necessary to implement the requirements derived from the FRAM and other NNSA requirements assigned to the Site Office. Expectations are defined and processes are in place to ensure that competence is commensurate with assigned responsibilities (DOE O 360.1B, DOE O 426.1, NA-1 M 426.1-1A, NNSA FRAM).
5. Site Office mechanisms include a Differing Professional Opinion (DPO) process and the Site Office has ensured that the Site Contractor has also implemented a DPO process (DOE M 442.1-1, NA-1 SD 442.1-1).
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 (DOE P 450.4, DOE O 360.1B, NNSA FRAM).

APPROACH

References:

- 10 CFR Part 830, *Nuclear Safety Management*
- DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*
- DOE O 360.1B, *Federal Employee Training*
- DOE O 426.1, *Federal Technical Capability*
- DOE P 411.1, *Safety Management Functions, Responsibilities, and Authorities Policy*
- DOE G 450.4-1B, *Integrated Safety Management System Guide 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*
- DOE P 450.4, *Safety Management System Policy*
- DOE M 442.1-1, *Differing Professional Opinions Manual for Technical Issues Involving Environment, Safety, and Health*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM) (NNSA FRAM)*
- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*
- NA-1 M 426.1-1A, *Technical Qualification Program Plan for Federal Personnel with Safety Responsibilities at Defense Nuclear Facilities*
- NA-1 SD 442.1-1, *NNSA Differing Professional Opinions Manual for Technical Issues Involving Environment, Safety, and Health*

Record Review:

- Review the Site Office FRAM and implementing guidance. Determine whether the Site Office has established and documented how the specific functions and responsibilities assigned to the Site Office in the NNSA and Site Office FRAMs are properly discharged. Determine whether appropriate responsibilities and authorities are assigned.
- Determine whether Site Office procedures and mechanisms define adequate processes for the authorization and oversight of work. Determine if feedback and improvement programs are defined and in place, including DPO processes. Determine whether personnel assigned to perform these functions have clear roles and responsibilities.

- Verify that programs hold line management responsible for safety. Review personnel position descriptions, selection criteria, training programs, and training records to determine if there is a process that meets the DOE guidance and ensures competence commensurate with responsibility.

Interviews:

- Interview NNSA Site Office staff responsible for developing and maintaining the Site Office FRAM.
- Interview personnel responsible for the development of Site Office implementing procedures and processes, and verify understanding of line management responsibility for safety and clear roles and responsibilities.

Observations:

- If possible, observe NNSA Site Office oversight of the contractor in this functional area.