



Safety Directives Review: Providing a Systems-Based Approach to Directives Management

**Steve Kirchhoff
Office of Health, Safety and Security (HSS)
October 28, 2008**

Purpose & Benefits

- **Implement Secretary's Principles Governing Directives (9/10/07)**
- **Understand & address stakeholder concerns**
- **Document technical basis for each requirement**

Secretary's Principles

Desired Attributes of Directives:

- **What vs. How** (Clear requirements; Not *overly* prescriptive; “How” requirements for safety)
- **Requirements Not Duplicative** (no duplication of laws, regulations, or national standards)
- **Clear Applicability**
- **Resolve Conflicting Requirements**

Project Scope

- **Project Plan approved January 2008**
- **Safety Orders and Manuals (26) for which HSS is the OPI or “owner”**
- **All of interest to the DNFSB**
- **NOT Rules, Policies, Guides, Tech Standards, or Handbooks**

Leadership Team

Stephen A. Kirchhoff (HSS)

George J. Malosh (SC)

James J. Cavanagh (NNSA)

Richard F. Moorer (US)

Kevin T. Hagerty (MA)

Leadership Team Role

- **Provide overall direction & guidance**
- **Approve team members**
- **Approve release for DOE-wide review**
- **Approve review comments from their organization**
- **Identify lessons learned to improve directives process & implementation**

Project Schedule

- **Phased approach**
- **Started Phase 1A in January 2008 and Phase 1B in February**
- **Start Phase 2 in June 2008**
- **Start Phase 3 in November 2008**
- **Complete draft revisions in 4-6 months, followed by final review & issuance per DOE directives process**

Process – Key Attributes

- **Review Teams – 8-10 members typically**
- **Red Teams – 4-6 members**
- **Use of Requirements Database**
- **Establish basis for all requirements**
- **Use DOE decision-makers on policy**
- **Use approved P/O/M 251 process**
- **Identify changes for guides/standards**

Systems-Based Approach

- **Phased approach based on grouping directives into topic areas**
- **Nuclear Safety Operations (Phase 1)**
- **Management Systems (Phase 2)**
- **Worker Safety (Phase 3)**
- **Feedback and Improvement (Phase 3)**

Phase 1A Directives

- **O 425.1C, Startup and Restart of Nuclear Facilities**
- **M 426.1-1A, Federal Technical Capability Manual**
- **O 5400.5, Radiation Protection of the Public and the Environment**

Phase 1B Directives

- **O 433.1A, Maintenance Management Program for DOE Nuclear Facilities**
- **O 5480.19, Conduct of Operations Requirements for DOE Facilities**
- **O 5480.20A, Personnel Selection, Qualification, Training and Staffing Requirements for DOE Reactor and Non-Reactor Nuclear Facilities**

Phase 2 Directives

- **M 140.1-1B, Interface with the Defense Nuclear Facilities Safety Board**
- **O 226.1A, Implementation of Department of Energy Oversight Policy**
- **M 411.1-1C, Safety Management Functions, Responsibilities, and Authorities Manual**
- **O 414.1C, Quality Assurance**
- **M 450.3-1, DOE Closure Process for Necessary and Sufficient Sets of Standards**
- **M 450.4-1, Integrated Safety Management System Manual**

Phase 3 Directives

- **O 210.2, DOE Corporate Operating Experience Program**
- **O 225.1A, Accident Investigations**
- **O 231.1A, Environment, Safety, and Health Reporting**
- **M 231.1-1A, Environment, Safety and Health Reporting Manual**
- **M 231.1-2, Occurrence Reporting & Processing of Operations Information**
- **O 252.1, Technical Standards Program**

Phase 3 Directives

- **O 420.1B, Facility Safety**
- **O 440.1B, Worker Protection Management for DOE Federal Employees**
- **M 440.1-1A, DOE Explosives Safety Manual**
- **M 442.1-1, Differing Professional Opinions Manual for Technical Issues Involving Environment, Safety, or Health**
- **O 5480.30, Nuclear Reactor Safety Design Criteria**

Contact Information

Steve Kirchhoff

HSS Chief of Staff (HS-1)

(202) 586-3373 at Forrestal

(301) 903-2824 at Germantown

stephen.kirchhoff@hq.doe.gov