

**Environmental Subgroup
Integrated Safety Management Working Group
Spring, 2007 General Meeting**

Thursday, May 10

Welcome, Introductions Gary Shamber, SNL/CA

- Discussion on SG meeting at non-ISMWG meetings: Useful for thinking outside of the 'EFCOG' box; Need to retain one meeting/year with the remainder of the ISMWG.
- Dinner out a location to be chosen.
- Briefing on the Agenda, call-ins planned.

EO 13423 Discussion (Steve Woodbury, HS-20)– What is new? What has changed? How will this affect org structures? Thoughts on implementation?

- RE-ORGANIZATION OF THE HQ OVERSIGHT GROUP.
 - Environment separated into 2 offices: Office of Nuclear Safety & Environment. Splitting out Policy and Assistance functions to allow for one group to focus on the Assistance efforts.
 - Development of an EMS Assistance Network – partially for development of additional support efforts/meetings. First call-in held with the federal site coordinators with linkage. Gary & Susi noted that this effort might lead to a duplication of the EFCOG activities. John Irving noted that this could certainly assist in getting the word out about the on-line EMS workbook.
 - Kathy Carney noted that EFCOG might be seeing some duplication, as there is an Energy Working Group already within the EFCOG. We need to manage the EFCOG resources and coordination effectively.
 - Steve noted the reorganization is assisting the HQ offices in getting a better integration of its management functions and responsibilities.
- IMPACT OF THE NEW ORDER:
 - New E.O. will require coordination of activities that have been managed, but not within the intended framework of the EMS, though there may be a management system in place.
 - Concern that 'goal' may become 'requirements'.
 - Steve noted that there likely would need to be updates of the EMS guidance developed by the prior HQ organization, to reflect the changes that exist due to the E.O.
 - Question on whether ISMS will be re-aligning for consistency with existing consensus standards, as EMS has been configured in line with ISO14001? Steve indicated that such a discussion hasn't yet happened, and that there would likely be reluctance something that isn't broken.
 - Steve noted that CEQ has issued a new guide/cross-walk for EMS & NEPA, in light of the new E.O. The guide is suggested as a useful tool for evaluating the effectiveness of site's NEPA effort.
 - Noted that CEQ guidance/direction is not binding on contractors until DOE may revise contracts to reflect the duties that the E.O. places on DOE. Steve indicated that O 450.1 is to be revised within a year, hopefully shorter. In part, the new EMS call-in group will assist in working through some of the issues as they arise.
 - Steve noted that DOE is responsible for implementing the E.O., that site offices will determine the best means to flow the requirements to the contract operator, and that his office will be working within the DOE

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- organizations to assure that flow-down is effective. Thus, there will be tailored approaches to incorporating the goals.
- Kathy noted that many of the requirements are already in contracts under other sections of their contract(s), or have been identified previously as aspects for the sites where efficiencies may be found. It may be that any revision to O 450.1 may not be significant to the sites.
 - PATH FORWARD
 - Jane Powers is lead on revising guides and directives.
 - There continues to be an inter-agency working group that has coordinated metric development; they are already meeting to walk through the E.O. to see where there may be opportunities for interagency, coordinated and consistent development.
 - DOE's order that set a senior official for response to the E.O., there is still a need for DOE to work out a MOA between all the various DOE offices that may have responsibility for developing guidance/policy. This coordination has not occurred and some DOE offices are beginning to work up separate policies. DOE needs to get alignment before the rule of 'unintended consequences' is triggered.
 - Gary noted that the E.O. will impact several DOE orders, and that several different DOE groups (e.g. Building Energy Efficiency; Utilities orders) are working on modifying their guidance documents – there is a significant need for coordination within DOE offices.
 - REVIEW (DOCUMENT - NEW EMS REQUIREMENTS PURSUANT TO EO 13423 – DRAFT).
 - Concerns were raised on how metrics will be developed, contractors will be reporting on those activities where they have no aspects (some contractors have no vehicle fleets, do not manage/control buildings, etc...). Steve indicated that he will keep this concern in mind while he is involved in developing the process will be reporting on metric – and which measurements provide value.
 - Jack Mizner noted that it would be useful to have the ability to combine reports –that sites would only have to be reporting on metrics for one data call, rather than multiple data calls from different DOE organizations.
 - BNL requested that contractors should not be required to develop Objectives/Targets for each metric, as that defeats the purpose of a site identifying those aspects that are 'significant' for them at the time. LLNL similarly noted that prescriptive objectives/targeting from a contract basis would defeat the intent of the ISO.
 - SPR noted that sites can structure their EMS' to include other DOE requirements that are more 'business-interest' that should/must be considered in the setting of EMS-managed goals & objectives. They have been using this method. Steve was encouraged to bring this forward to the HW guidance development group(s), along with looking at how sites have met or are meeting goals for non-EMS purposes (that are supporting the EMS).
 - Gary noted that the E.O. seems to push ISO 14001 – will this be pushed down to the site levels and are contractors expected to get ISO certified? Steve did not see that happening. Steve noted that the ISM/EMS integration will be a special effort for DOE.

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- Sharing of EMS auditors between sites/contractors discussed – noted that this is a task for the SG.
- NTS noted that guidance on what is incorporated in the ASER – how will the sites be expected to modify their annual reports? Guidance is still pending, may come out this fall, as a topic for the fall monitoring meeting.
- Suggestion: HS-20 investigates proposed data calls to see if data is already being collected from other systems; provide as guidance to sites/site offices. Various ideas brought forward on where efficiencies in data calls could be found.
- Suggestion made to re-time the ASER to fiscal year was raised; concerns noted that some regulatory reporting still is calendar year, and there may not be some efficiency in doing that.
- Questions raised as to who could provide acceptable '3rd party' status for auditing an EMS? Steve indicated this is a matter of negotiation. Sites have been using their 'Internal Audit' offices, either site or corporate, to perform this function and to date that has proven acceptable to agencies. Steve could see that this is a matter that may require further instruction/guidance relating to acceptability of an Internal Audit department - perhaps coming from the OFEE. ICP noted that this auditing organization has been accepted by other DOE entities (e.g., procurement, radiation safety, etc...).
- Changes from current DOE O 450.1 – setting requirement to 'appropriate organization' – setting a management decision requirement for DOE to determine which organizations, and at what levels, there will be EMS established. This will likely be addressed via revision of DOE ISMS manuals.
- Steve ended by noting that any adjustments/suggestions people would like to pass on would be appreciated.

Lunch (Environmental Summit closing Jazz Brunch)

PRESENTATIONS: (PowerPoint presentations to be provided/linked)

EPA Performance Track – Where it's headed; successes; State initiatives:

John Foster & Andy Teplitzky, USEPA Environmental Performance Track

- John: Overview of Performance Track: history & structure.
 - Some corporate performance ratings (Risk/Investment) being impacted by status.
- Andy: Outreach to the states
 - Some states had programs pre-dating EPA.

Executive Management Engagement with EMS at INL: John Irving, INL

- Why is Management engaged? IF they don't see any value, it won't survive!
 - Try to get from 'support' to 'active involvement'.
- Meeting with Auditors: Whom, what evidence provided, who signs (owns) the EMS?
- Beginning to see employee buy-in.
- Watch for the Dangers of: passive involvement (active listening happening?); no findings or observations noted (no opportunities for improvement); complacency from 'success'.

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- Fixes for Complacency: Spend most time on what needs to be fixed.

Break

Executive Management Engagement with EMS at ORNL: Kathy Carney, ORNL

- Had to modify strategy of engagement – as the system matured.
- Engage the line, recognize their progress, and communicate their successes.
- Support efforts of the other support organizations.
- Use common, familiar processes – Build new when needed.
- Look beyond Compliance, into all aspects of business (cost, process time)
- Mentor the staff to needed practices and behaviors regarding outreach to on-site groups.
- When get feedback or concerns, fix & BE SURE to communicate the results!
- Provide mid-year/end-of-year summary of actions, statistics, and progress to management.
- *INL noted that as you clear the 'low' hanging fruit, obtaining 'A' ratings becomes increasingly difficult (may resolve into dealing with multi-year projects?)*
- *ANL noted that with new facilities coming on-line, there is potential for inability to reduce energy consumption. Discussed on what metrics may be called for (Btu/sq. ft. usage rather than total Btu energy consumption).*
- *BNL asked if sites are beginning to consider either nanotechnology or greenhouse gas footprint evaluation? Some sites indicated they have had discussions, but no consensus.*

Executive Management Engagement with EMS at LANL: Sonja Salzman, LANL

- Managing in the face of massive re-organization (31 divisions became 69) due to contract changeover. Had to raise it one level of management.
- Identify common, institutional goals that cut across the divisions/directorates for action and implement across the site.
- New contract calls for implementation and the management team monitors this activity closely.
- *BNL: Org needs to be mindful during organizational changes that responsibilities do not drop off or get lost as persons are re-assigned. The tracking database in use to assist with this.*

Executive Management Engagement with EMS at SPR: David Folse, SPR

- Have a very stable mission and responsibility, stable organization size & scope; this allows an EMS that covers a well-defined, mature scope.
- The scope of Management Reviews is established up front and is fairly consistent.
- Perform regular audits of sites for varying portions/aspects of the EMS.
- One system for all SPR sites – participants via teleconference for the management review.
- Mid-level management brought on-board through realization that senior management meant the commitments to be met.
- Objectives are to be met, even under adverse, abnormal conditions.

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Hazardous Management/UMC– EFCOG Team Update - Mark Brynildson, SNL/CA
(call-in)

- Follow-up from last meeting & recent meeting in Atlanta (ISMWG) & San Antonio (Emergency Management) meetings
- Global Harmonized System/Structure for chemical data may facilitate data development.
- Reducing inventory of chemicals at certain locations can eliminate the emergency planning requirements for area(s), per DOE orders.
- Plan to flow-down requirement at SNL/CA for Line to provide updates to the Chemical Inventory System (CIS) upon final disposition of a container. Requestors will routinely be asked to confirm location & delivery.
- SNL/CA apparently performs focused reconciliation walk-downs regularly, though not necessarily scheduled or routine. They perform an annual reconciliation annually, using summer interns, across the site. This takes them about 2-3 months, along with the data entry/updating. Under-performing locations may be visited more frequently. During the meetings he has attended, various sites reported performing similar reconciliation efforts, but with varying frequencies and purposes.
- To control chemical inventory, need to control the purchasing process for chemicals.
- *ORNL asked about problems with chemicals with limited shelf life – Mark indicated that SNL has been working on this for some time and thus has been able to address those containers with chemicals that have exceeded their shelf lives – additionally they are able to point out that the chemicals likely are not going to be as effective and should be replaced.*

Friday, May 11

8:00 – 8:05 Check In Gary Shamber, SNL/CA

8:05 – 8:10 EMS Certification – Survey Results Gary Shamber, SNL/CA (see hand-out)

8:10 – 9:00 Round Table: What issues are you dealing with? Lessons Learned? EMS status

- **SPR:**
EMS – waiting on new reporting format & fitting them without adding additional burden on personnel. Being very careful with terminology that has specific definition in the ISO/EMS world.
 - *Steve: Would there be benefit for guidance document to have a section for an ISO auditor, to clarify terminology? Bill Bozo suggested against that, as Registrar should be focused on the EMS documentation, not the DOE order. Steve intends that there will be discussion prior to any posting for formal review.*
 - *Steve Birrer indicated that Registrar-oversight initiated assessments need to be used to meet DOE – HQ oversight audits. They are not seeing reduction in weeklong assessments, which might be possible if contractor has ISO-registration. He suggested a reduction of audits/assessment of*

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EMS-related activities based on the certification, to provide some benefit to the field from certification (Orin agreed). Another suggestion was to try and get HQ program personnel shadowing the Registrar-performed audit.

- Expansion of the SPR: Bill indicated they are completing NEPA process for a new facility and the expansion of existing facilities. They are working on source water supplies for new caverns.
- Flexible Air Permit: They were looking at the roll-up, but the need to re-perform BACT did not make a strong business case.
- Discharge operations for Brine has had to be reviewed as models changed and they had run into a concern of having to discharge when they did not need to in order to conduct required WET testing.
- Bio-Based hydraulic Fluids: they are looking at this; SNL/NM

- **Pantex**
 - Permitting of wastewater, flexible air permitting discussed.
 - EMS: working for Clean Texas Gold level certification by end of FY.

- **ORNL**
 - Undergoing NPDES permit renewal. There have been several initiatives to eliminate discharges of cooling water (reduction of once-through cooling).
 - Concern with Office of Science becoming involved in the EM contractor and the Legacy site continuing management. They have several cleanups that are coming to completion and they have not been involved in with the other site contractors (particularly where the boundaries are for clean-up, on-going management).
 - UMC strategy of DOE – what is to happen with material that becomes legacy due to reduction in funding by a DOE office, coupled with the continued dis-incentive to declare a material ‘waste’.

- **ANL**:
 - EMS: Certified ISO in 2005. They will be adjusting how they will re-work it to meet the DOE Order requirements that are not in ISO.
 - Contract renewal: Re-compete was achieved, but with many commitments that were new (ISO 9000 & 14001 certification). Considering how to meet these commitments efficiently.
 - Performance Track benefits: Would be interested, if there were some benefits (e.g., NPDES permit renewal fast-track). Having to train their permit writers. SPR noted that they had experience with this – they received action on a permit-renewal that had been ‘frozen’ for 14 years (EPA). Similar experience on state air permitting, which they had trouble keeping up with the state. Bill noted his Performance Track contacts had indicated expedited permit work was a significant benefit.

ISMWG UPDATE: JOE YANEK, Recap his presentation to the Board of Directors, and forward to 2007.

- Start up of a D&D working group; start 3 new working groups; ORPS task group is reviewing criteria for reporting (suggested we get someone helping with the Environmental reporting) –

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- Review changes in EFCOG & DOE (due to HSS formation).
- 40 companies of 65 members are actively participating in WGs.
- ISMWG review-
 - Supported the 2007 Chemical Safety workshop.
 - Medical looking at Pandemic preparation
 - 851 implementation is still a concern, especially with medical surveillance
 - Electrical Safety TG moved forward; number of events has been significantly reduced. Developing new model/means for tracking effectiveness of electrical safety to capture before reaching ORPS level. Prepping a course to roll-up for Non-electrical workers.
- 3 new issues for Directors
 - Difficulty of gaining demographic analysis of participation of members
 - Need re-focusing of Best Practices into one location.
 - Meeting facilities – where can we meet? ABQ alternative is DoD and is DOA.
- EFCOG has been asked to re-look at ISMWG to get a bit more streamlined and re-structured – we are very large compared to other working groups & subgroups. He is expecting to get some direction with meeting new directors in the new weeks.
- Website logistic support will be decreasing. EFCOG will be working through this.

BREAK

EXECUTIVE MANAGEMENT ENGAGEMENT IN EMS AT BNL – John Selva (call-in)

- Use of a formal Record of Decision for all actions agreed to, signed by lead Sr. Mgrs.
- One on One briefings performed when Sr. Mgr. unable to attend.
- Causal analyses of issues performed to identify which operational function of the EMS needed.
- *Bill Bozzo: What drives review? Scheduled for management review, not event driven. Work to get them conduct near beginning of FY. Often occur following the results from their assessment reviews. Site office is invited to shadow the assessments, and this has worked well. Gary: Any actions taken on how to maintain focus when things going well? John: this is on the various organizational representatives to maintain the focus within their organizations, with their management. He as the organizational coordinator keeps working on this.*

10:30 – 11:00 Round Table

- **LANL:**
 - Experiencing same concerns with legacy materials/facilities as ORNL, particularly as there is \$0 for overhead/legacy issues. Working on training for personnel to enhance their awareness
 - Metals Moratorium on Recycling still forcing them to send material out as waste that could be recycled – need guidance from DOE.
 - Implementing EMS: This was flowed out to a ‘test’ division, and then moved onto remainder divisions for action.
- **LLNL:**
 - EMS: continuing to ‘drill down’ of the organizations. Continuing to work the prioritization of aspects for significance for targeted action. Their

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- EMS is their ISMS for the site. Activity-based aspects tool is provided/available to operating organizations that assists them in ranking aspects for prioritization. Tool allows for customization by the user, with request to report back to site coordinators on tool changes.
- New Order: Goals becoming Requirements – management very concerned about setting ‘stretch’ goals that could become unfunded requirements.
- New Contract: Just announced, not certain what commitment were made in bidding/awarding contract. Have kept the system as simple as possible for ISO compliance – Simple gets personnel to buy-in. Trying to avoid non-value-added paperwork development.
- Work Control Process: Has become so cumbersome, it is difficult to schedule activities.
- Wetland mitigation: in reducing water discharges, had to deal with mitigation for an endangered species living in a habitat they had created.
- **ICP**:
 - From this Performance Track meeting: ANAB (org that certifies the certification groups, who determines what auditors need to audit & evaluate) standard focus – is shifting to ‘results-focus’ or performance, rather than structure of system. An associated concern is picking up on the ‘timing’ of the performance, if it does not allow for consideration of cause.
 - During regulatory inspection, their state gave concern about complacency; ICP is now looking for metrics on identifying and action on opportunities – if people are still making improvements, this demonstrates involvement, not complacency; that people are ‘thinking through’ what is going on.
- **NTS**:
 - Compliance: Have a Agreement in Principle for funding state/federal personnel who are only focused on NTS issues (they are there ALL the time). They were to get expedited action on certain efforts (permit renewals) – but, this is not happening.
 - EMS: They have a new contractor organization, with more of a DoD background. They committed to several initiatives and have shortened the schedule. Additionally, they are unable to do the early meetings with their designated registrar. Also, their current program is structured for ISO, trying to cover format to the Order – how are other sites managing that – with internal crosswalk. Discussion indicated other sites are working this.
- **Y-12**:
 - EMS: Self-declared in 2005, following 2-year implementation effort. This had been a bottom-up effort that had to be sold to upper management. Project was funded and took 2 years to complete and eliminated several tons of waste from one division. They now have the challenge to keep the ball rolling.
 - ODS reduction/elimination: did the goals for elimination get dropped off the table?
 - General environmental compliance: a lot of modernization, footprint reduction effort continuing. NPDES permit has an Hg discharge limit that

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they can't meet; EM effort is not consistent with the expectation from state permitting. They are working to get the permitting & remediation personnel within the state to talk & work together.

- **SNL/NM:**
 - Working to integrate several autonomous laboratory systems into one integrated laboratory program (in concert with EMS). This year, working to identify the values of integration: focused training on audit, bringing in certified auditors with gap analysis. Leveraging assistance from SNL/CA. Performing some benchmarking efforts with other sites (have visited another Lockheed location). This raises the question on whether to go for a site-wide ISO 9000 certification (some units have, but not all). Also, can they flow the ISMS process up through all the consensus standards? They found that Lockheed **develops goals and objectives for their entire Integrated Safety program**, not just the EMS portion. Frequency of evaluations is set by an internally assigned value for Risk of the activity/operation.
- **WIPP:**
 - Janitorial contract up for bid and looking for requiring green chemical usage. Bio-fuels looking for contractor usage, warranty concerns has slowed this initiative.
- **INL:**
 - Suggest a task to bring together information on meaningful management review, to keep it dynamic and effective. Offered to lead the task. Along this line, is there a consistent format that could/is being used for Management Reviews?
 - Struggling with tying objectives to aspects in a way that has meaning to management/personnel, and focusing on outcome rather than process assurance.
 - NEPA discussion – would be interested in how other sites are meeting their responsibility. At INL & NTS, DOE must sign off on all documentation. At NTS, they are beginning to re-open idled buildings – DOE wants a NEPA document to authorize re-op. They have developed a general re-op NEPA document. Y-12 is working through the process for maintenance actions and assuring NEPA conformance. Similarly for SNL/CA –they have an on-line NEPA review module for work processes, but this continues to consume a great deal of time of line personnel. LLNL reviews everything, does not use a NEPA checklist, and DOE has access to the reviews. If needed, LLNL requests specific direction from their office. SNL/NM is developing a review module for work planning that covers the NEPA issues.
- **SNL/CA:**
 - Re-organized an advisory team to extend the outreach and input on establishing goals & objectives -
 - Executive team for EMS has been re-organized & Lead has expressed interest for personal involvement.
 - Struggles: proper management of Universal/E- Wastes, particularly with considerations for cyber-Security. P2 organization is reviewing opportunities.
 - Budget: expect flat for 5 years; and looking at how maintain programs.

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11:00 – 11:30 Subgroup Planning – Where do we want to go? Do we have a vision?

- Next meeting ideas:
 - Site presentations on how they manage their NEPA process (get posted the checklists/procedures for pre-review?) OR How do sites flow their significant aspects into Goals & Objectives. OR How do we anticipate changing our programs in response to a revised O 450.1; Alternative fuels issues (likely the province of other site groups [Maintenance]).
 - Format of presentation: get more people involved in 30-minute bursts-20 minutes with 10 minute Q/A. Do people want to have a focus for these presentations? This seemed to be useful in this instance.
 - Suggest Fall meeting with the EFCOG; Spring meeting coordinate with other groups? Perhaps a spring workshop effort. Or meeting with another EFCOG WG. (Keeping in mind the mention of a re-structuring of the EFCOG).
 - Vice-chair position needs to be filled.
- Continued use of call-in presentations or participation?
 - Possible disruption of scheduling call-ins. Teleconferencing may needed as funding get increasingly flat.
 - Being able to listen in has been beneficial, but active participation is needed. ICP was very concerned that teleconferencing will lead to participation with no engagement.
 - Preference to physical participation

11:30 – 12:00 Wrap - up Gary Shamber, SNL/CA

- Gary will follow up with task-owners individually to check on status; will work with John Irving on developing task sheets for his concerns.
- We need to continue developing Best Practices.
- We need a vice-chair. Some attendees indicated they will discuss with their management.