

**U. S. Department of Energy
Carlsbad Field Office****MANAGEMENT PROCEDURE****CBFO MP 5.4, Rev. 0**

Effective: 26 September 2007

SUBJECT: ORDERS COMPLIANCE PROGRAM IMPLEMENTATION

Manager, Carlsbad Field Office: Original Signature on File

Date: 9/26/07

1.0 PURPOSE

The purpose of this procedure is to provide a systematic approach to effectively and efficiently implement the Orders Compliance Program for the Department of Energy (DOE) Carlsbad Field Office (CBFO).

2.0 SCOPE

This management procedure (MP) provides a process for comprehensive review of all DOE requirements, directives, and related standards that may be applicable to CBFO contracts, and a formalized mechanism that incorporates the applicable standards and requirements into CBFO contracts. This MP reflects a direct flow-down to oversight of integrated safety management (ISM) principles as described in Attachment I.

3.0 REFERENCES AND DEFINITIONS**3.1 References**

- 3.1.1 Management Assessment MA-07-03-SRIDS
- 3.1.2 Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 90-2
- 3.1.3 DNFSB Recommendation 95-2
- 3.1.4 DOE/CBFO 98-2276, *Integrated Safety Management System Description*
- 3.1.5 DOE-P-450.4, *Safety Management System Policy*
- 3.1.6 DOE-M-450.4-1, *Integrated Safety Management System Manual*
- 3.1.7 DOE-G-450.4-1, *Integrated Safety Management System Guide*
- 3.1.8 DEAR 970.5204-2, *Laws, Regulations, and DOE Directives*
- 3.1.9 DEAR 970-5223-1, *Integrated Safety Management System*

AVAILABLE ONLINE AT:<http://bellview/cbfo/Procedures/ProcedureManualTOC.htm>**INITIATED BY:**

CBFO Authorization Basis Senior Technical Advisor

3.2 Definitions

3.2.1 **Applicability Review** – Determination on directives that may affect CBFO and contractor administrative and operational activities.

3.2.2 **Orders Compliance** – A contractual process that is defined as adhering to, and demonstrating adherence to, laws, regulations, or policies, in conformity of fulfilling official requirements when applicable DOE Order statements (mandatory and non-mandatory) are included in appropriately documented policies, programs, procedures, and practices, and demonstrably adhered to during office or facility activities.

4.0 **RESPONSIBILITIES**

4.1 CBFO Manager and CBFO Deputy Manager

Overall responsibility for oversight of the Orders Compliance Program Implementation procedure.

4.2 CBFO Authorization Basis Senior Technical Advisor (ABSTA)

4.2.1 Exercise management responsibility, accountability, and leadership for ensuring adequacy and inclusion of directives into CBFO contracts.

4.2.2 Appoint the Applicability Review Team Leader, as needed.

4.2.3 Make recommendations to the Manager's Office for inclusion of requirements into the various DOE CBFO prime contracts.

4.3 CBFO Industrial Safety Specialist

4.3.1 Coordinate the overall Orders Compliance process to ensure applicability reviews are conducted and documented, as needed, for inclusion in the records package.

4.3.2 Request appointment of an Applicability Review Team Leader, as needed.

4.3.3 Coordinate clear and concise communications to produce a monthly report pertaining to Orders Compliance for delivery to the ABSTA and inclusion in the records package.

4.4 CBFO Contracting Officer

4.4.1 Communicate the inclusion of directives into CBFO contracts.

4.4.2 Facilitate CBFO/contractor interface regarding CBFO contracts.

4.4.3 Modify the CBFO contracts as necessary.

4.5 Applicability Review Team Leader

4.5.1 Lead applicability reviews in accordance with this procedure.

4.5.2 Ensure the Directive Applicability Review Form (Attachment II) and required logic for each reviewer is completed and included in the records package.

4.5.3 Provide a completed recommendations package to the Industrial Safety Specialist.

- 4.6 CBFO Applicability Review Team Members (CBFO senior staff)
 - 4.6.1 Participate in applicability reviews and attend all review team meetings.
 - 4.6.2 Complete relevant sections of the Directive Applicability Review Form (Attachment II), including the required logic addressing new and/or revised directives according to the following procedure.

5.0 PROCEDURE

NOTE: All communications should be by email except contract communications to contractors, and the Directive Applicability Review Form.

- 5.1 The Industrial Safety Specialist shall review new and/or revised directive(s) and notify the ABSTA via email of additions or changes requiring review.
- 5.2 As needed, the Industrial Safety Specialist may advise the ABSTA to appoint an Applicability Review Team Leader for specific additions or changes.
- 5.3 The ABSTA shall appoint an Applicability Review Team Leader, as needed using email.
- 5.4 The Applicability Review Team Leader shall identify appropriate Applicability Review Team Members on the Directive Applicability Review Form (Attachment II) and route the form to the team members for their assessment of directive applicability to CBFO contracts.
- 5.5 The Applicability Review Team Leader and team members shall provide applicability review logic to the Industrial Safety Specialist via a completed Directive Applicability Review Form within 14 calendar days after receipt of the assignment.
- 5.6 The Industrial Safety Specialist shall review the completed Directive Applicability Review Form and provide associated recommendations to the ABSTA within 7 calendar days after receipt of the completed Directive Applicability Review Form.
- 5.7 The ABSTA and Industrial Safety Specialist shall review the Directive Applicability Review Form and associated recommendations. If the review reveals that the directives are not applicable to CBFO contracts, then no further action is necessary. If the directives are applicable, then the ABSTA shall provide the Deputy Manager with a recommendation on a directive, including the Directive Applicability Review Form.
- 5.8 The Deputy Manager shall advise the Contracting Officer to notify the applicable CBFO contractor of the intent to revise the contracts directives list.
- 5.9 The CBFO contractor, within 30 calendar days after receipt of the Contracting Officer's notification, shall advise the Contracting Officer of the potential impacts of compliance with the revised directives list.
- 5.10 The Contracting Officer shall apprise the ABSTA and Deputy Manager of any potential impacts of implementation.
- 5.11 If the Deputy Manager decides NOT to proceed based on contractual, budgetary, or other constraints, he will indicate his decision and rationale in the appropriate space on the Directive Applicability Form, then provide the form to the Contracting Officer, who shall notify the CBFO contractor that DOE directives will not be added to the contract and *no further action is necessary*.
- 5.12 If the Deputy Manager decides to proceed, he will indicate his decision in the appropriate space on the Directive Applicability form (no rationale is required). The Contracting Officer shall notify

the CBFO contractor that DOE directives will be added to the contract at least 30 calendar days prior to the effective date for implementation, unless otherwise directed.

5.13 The Contracting Officer shall ensure that the contract is modified to incorporate the revised directive list.

5.14 The verification of Orders Compliance shall occur through Integrated Safety Management System (ISMS) review.

6.0 RECORDS

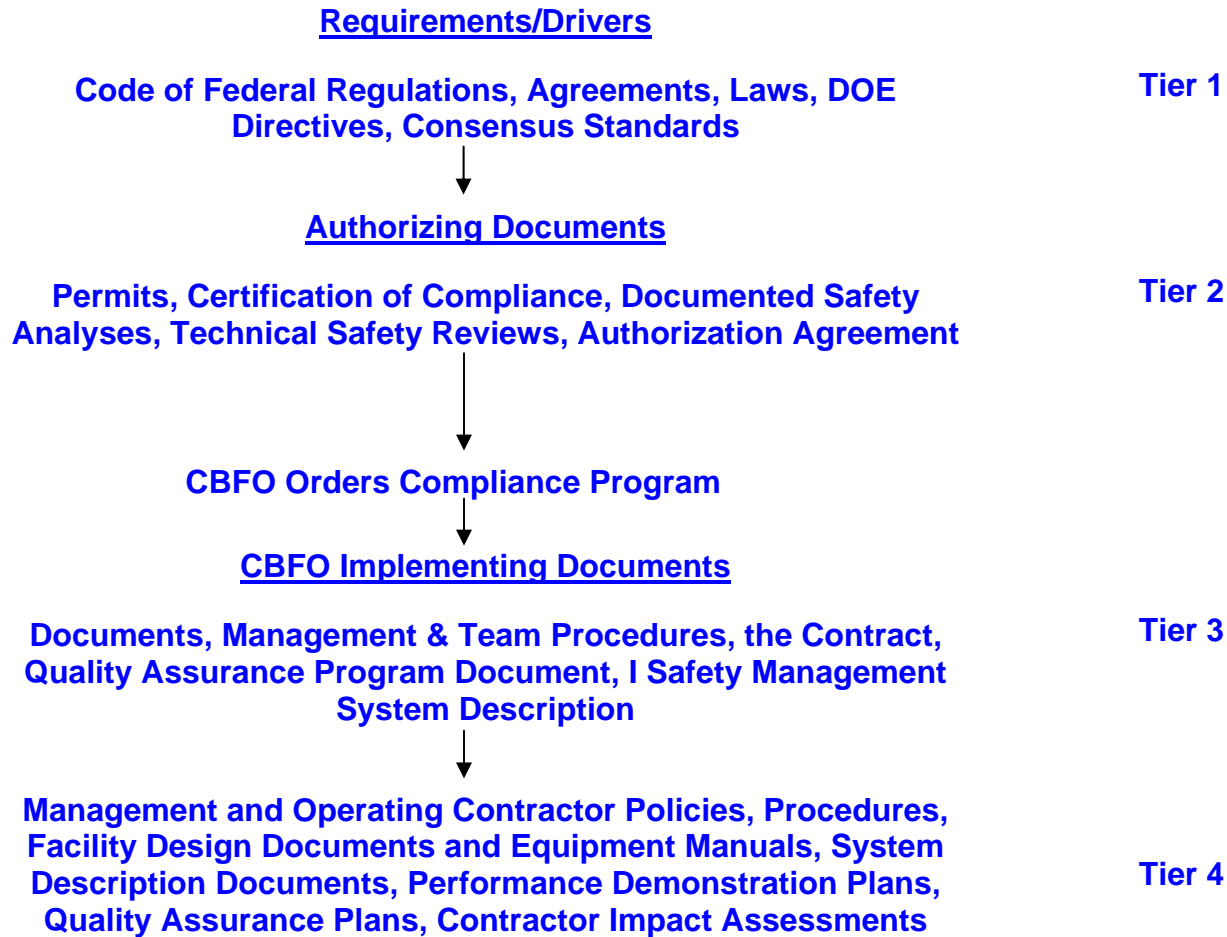
Completed Directive Applicability Review Forms shall be processed as records in compliance with current CBFO records management procedures.

7.0 ATTACHMENTS

Attachment I Overview of ISM Implementation

Attachment II Directive Applicability Review Form

OVERVIEW OF ISM IMPLEMENTATION

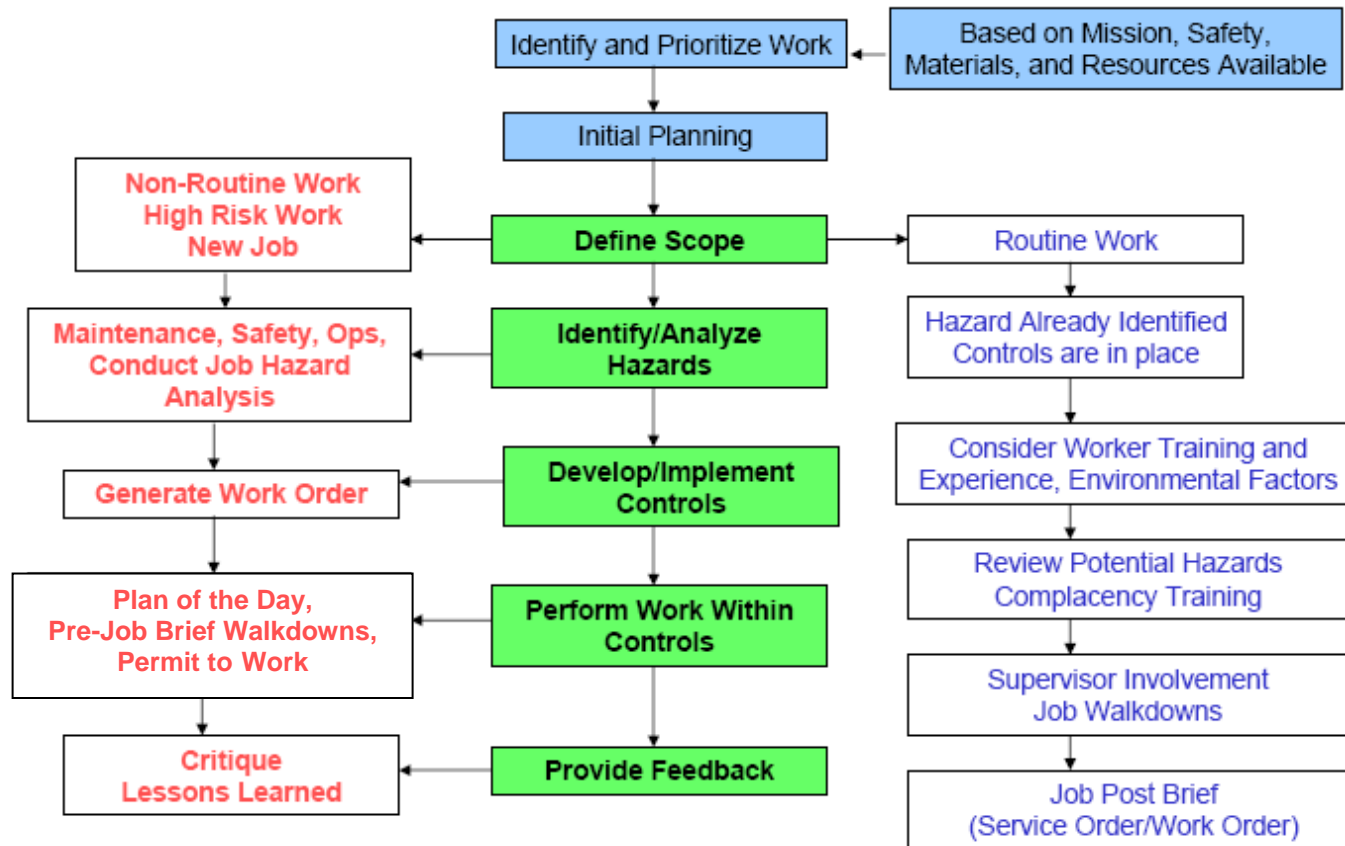


CBFO Orders Compliance Goals

- The goal of CBFO Tier 3 documents is to ensure that upper-tier documents (Tiers 1 and 2) are fully satisfied by lower-tier documents (Tiers 3 and 4).

- Another goal is to ensure that changes to a lower-tier document (Tiers 3 and 4) do not compromise ISM upper-tier requirements that were satisfied by previous revisions of that document.

ISMS WORK FLOW PROCESS



CBFO Form 5.4-1

DIRECTIVE APPLICABILITY REVIEW FORM

REPORT NAME/NUMBER _____

REQUESTOR _____

REVIEWER NAME/ORGANIZATION	Y/N*	SIGNATURE/DATE

*Attach logic.

CBFO Deputy Manager approval/disapproval decision

Add Directives to the Contract

Do NOT add Directives to the Contract

Rationale:

CBFO - Deputy Manager

Date