

NATIONAL ENERGY TECHNOLOGY LABORATORY

Albany, OR • Morgantown, WV • Pittsburgh, PA



OPERATING PLAN 450.4-01G

Title:		INTEGRATED SAFETY MANAGEMENT SYSTEM PLAN					
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FORMS

There are no forms in this operating plan.

1. **PURPOSE**

a. The purpose of this plan is to document the NETL environment, safety, and health (ES&H) activities, functions, responsibilities, and authorities that support the integrated safety management system (ISMS) and the environment, safety, and health management system (ES&HMS).

2. <u>APPLICABILITY</u>

a. This operating plan applies to all employees, research associates, sites, and visitors to NETL.

3. <u>PLAN</u>

a. <u>Executive Summary</u>

This integrated safety management plan is intended to support the ISMS and the ES&HMS and to define those activities, functions, responsibilities, and authorities required to maintain those systems. This plan sets forth the principles and goals by which NETL will accomplish its work so that the public, employees, property, and the environment are protected.

The plan was developed to meet the requirements of DOE Policy 450.4, Safety Management System Policy, and the Office of Fossil Energy's (FE) ES&H commitment that states that FE will adopt the integrated safety management system as the framework for its Environment, Safety, and Health Management System and related programs. This plan is also consistent with FE's functions, roles, and authorities manual (FRAM). The DOE Guidance Manual, DOE Guide 450.4-1, was used to prepare this plan.

The plan addresses the following six components:

- Component 1: Objective of Integrated Safety Management
- Component 2: Guiding Principles for Integrated ES&H Management
- Component 3: Core Functions for Integrated ES&H Management
- Component 4: Integrated ES&H Management Mechanisms
- Component 5: Responsibilities for Integrated ES&H Management
- Component 6: Implementation of Integrated ES&H Management

b. <u>Component 1: Objective of ISMS</u>

NETL is committed to a management systems approach to ensure work is performed safely and in a manner which protects workers, the public, and the environment. This approach is called the ISMS, and the policy for this approach is contained in DOE Policy 450.4, Safety Management System Policy. ISMS provides a formal, organized process by which NETL plans, performs, assesses, improves, and maintains the safe conduct of work by integrating safety into the work process. ISMS is also the basis for

NETL's ES&HMS, which is certified to the ISO 14001 and OHSAS 18001 standards. The ISMS champion and ES&HMS representative for NETL is the deputy director of the Environment, Safety, Security, and Health (ESS&H) Division.

ISMS consists of six components, as shown in Figure 1. The following sections of this plan explain how NETL implements each of these components. This plan captures the policies, roles and responsibilities, processes, and guidelines for implementing ISMS. The Functions, Responsibilities, and Authorities Manual (FRAM), Attachment 1, contains the responsibilities and authorities needed to support the ISMS.

(1) Policy

NETL will achieve environmental, safety, and health quality by proactively, systematically, and fully integrating ES&H considerations into the planning and execution of all work, so that the mission is successfully accomplished for the safety and health of the public without detriment to NETL or the environment.

NETL is committed to reducing environmental, safety, and health impacts by:

- Complying with all applicable ES&H laws, regulations, and standards through rigorous regulatory compliance programs.
- Implementing pollution prevention programs to eliminate or reduce waste and emissions and accident and incident reduction programs to eliminate or reduce accidents and incidents.
- Conserve energy and materials through resource management and recycling or reuse.
- Using safety analysis and review systems to identify, control, and reduce safety and health risks and environmental impacts through engineering and administrative controls.

NETL will work continually to improve environmental, safety, and health systems with the goal of improved ES&H performance. Performance will be measured against stated objectives and targets.

NETL will communicate information to employees and seek their involvement in reducing our environmental, safety, and health impacts and communicate our policies to stakeholders and the public.

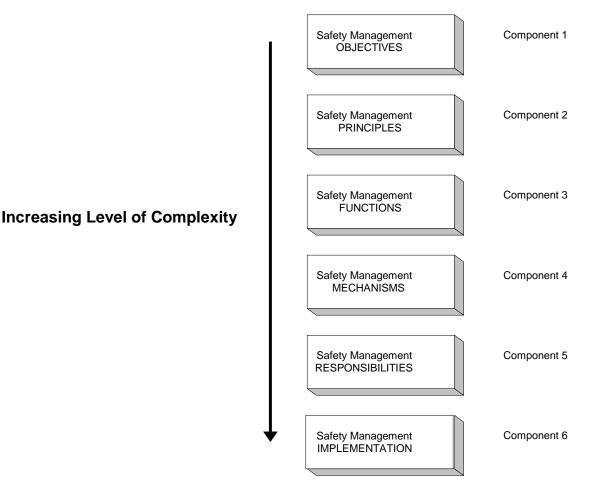


Figure 1. Integrated Safety Management System Components

(2) Commitment

NETL implements the above policy by striving to achieve DOE ES&H goals set forth in DOE Policy 450.7. In addition, NETL is committed to achieving the ES&H goals developed by the Office of Fossil Energy in the Commitment to Environment, Security, Safety, and Health.

(3) Input to Directives and Resource Allocations

NETL will provide input to departmental ES&H policies, orders, guidance, and strategic decisions that may affect the NETL sites. NETL commits to implement ES&H program guidance that will enhance performance at the NETL sites. NETL also commits to provide input to proposed allocations for its ES&H program.

c. <u>Component 2: Guiding Principles for ISMS</u>

The following are the principles of ISMS by which NETL will operate. By carrying out these principles, NETL ensures that its ES&HMS meets the objectives and policies stated in Component 1.

(1) Line Management Responsibility for Safety

Line management, from the director down through the management ranks, has the ultimate responsibility for the safety of employees, the public, and the environment. This responsibility cannot be delegated.

(2) Clear Roles and Responsibilities

Attachment 1 is a matrix that outlines the general roles and responsibilities for the various ES&H functions within NETL. Specific roles and responsibilities are contained within NETL directives.

(3) Competence Commensurate with Responsibilities

All employees have the required competence, training, equipment, and knowledge to conduct their work in such a way as to prevent injury to employees, the public, or the environment. NETL continues to improve employee performance through training, professional certifications, advanced education, and practice.

(4) Balanced Priorities

Resources are allocated to address ES&H issues and concerns. ES&H issues are balanced with overall programmatic needs. However, no operation is ever undertaken which endangers employees, the public, or the environment unless mitigation measures are first identified and implemented to reduce the risk to an acceptable level. The primary process for planning, requesting, and allocating resources is the departmental budgeting process.

(5) Identification of Safety Standards and Requirements

NETL identifies the requirements needed to operate its facilities safely and maintains these standards by identifying hazards associated with projects, support operations, and facilities and through review of new regulatory and DOE policies. The standards are implemented in the following priority: laws, regulations, DOE orders, consensus standards, and best management practices.

(6) Hazard Controls Tailored to Work Being Performed

The order of protective controls is engineering, administrative, and personal protective controls. All efforts are made to first provide protection through engineering controls. When engineering controls are not practical or possible, then administrative controls are used. Finally, personal protective controls are used as a last resort when engineering and administrative controls are not feasible.

(7) Operations Authorization

The safety analysis and review system (SARS), the work control system (WCS), and the work permit system (WPS) ensure that all operations containing hazards are fully reviewed, appropriate controls are implemented, and formal approval is obtained to begin the operation. The cognizant office director approves the operations under their control through the SARS.

d. <u>Component 3: Core Functions for Integrated ES&H Management</u>

Five core safety management functions provide the necessary structure for work activities to prevent injury to employees or the public or damage to the environment. The functions are part of a continuous cycle and are shown in Figure 2.

- (1) Define Scope of Work
 - (a) Translate Mission into Work

NETL's mission is to resolve environmental, supply, and reliability issues associated with the use of fossil energy. The Executive Board allocates resources to the work to be accomplished based on technical and political direction from DOE Headquarters and Congress. Project implementation plans describe the research and development projects to be executed, and other pertinent program plans include details of operations that support the mission.

(b) Set Expectations

Project requirements flow into R&D contracts for work that is performed offsite. These projects are overseen by project managers. Onsite requirements flow down into site support contracts through tasks which are managed by federal task contracting officers or their representatives. Site support contractors communicate requirements into subcontracts and create and maintain ISMS plans which are submitted to NETL for approval. In addition to the plans previously mentioned, directives implement the identified ES&H standards and performance expectations. These documents are available to all employees.

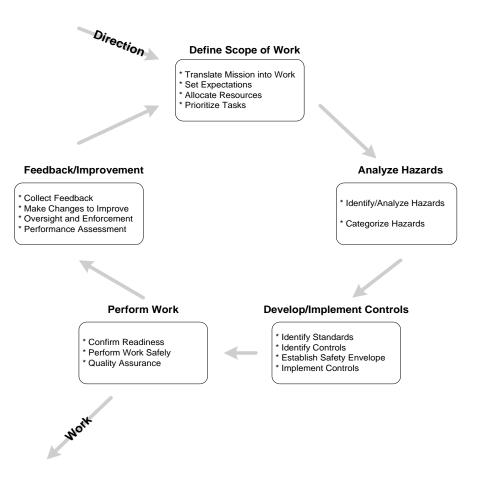


Figure 2. ISMS Functions

(c) Allocate Resources

Appropriate resources are made available to staff ES&H functions, to make corrective actions, and to maintain and improve existing programs. The mechanism for allocation captures the resource needs and provides a priority system for use of these resources.

(d) Provide for Integration

Since NETL is a government-owned, government-operated laboratory, ES&H is integrated across all NETL sites, operations, and employees, including contractors. All employees must adhere to NETL ES&H requirements, policies, and procedures, regardless of employer. Employees receive the same ES&H training and have access to ES&H program documentation. The ES&H program is seamless across all of NETL. (e) Prioritize Tasks and Allocate Resources

ES&H tasks are prioritized based on the hazards and associated risks of the project, support operation, or facility. The hazards and risks are analyzed through the safety analysis and review system, which also provides for mitigation strategies and controls to ensure that risk is managed and maintained at the lowest level possible.

- (2) Analyze the Hazards
 - (a) Identify Hazards

Before any project, support operation, or facility construction or modification is undertaken, it must undergo a full safety analysis and review. This review ensures that hazards have been identified and addressed and that the operation is fully compliant with all identified ES&H standards. This review is documented in a SARS package that is maintained throughout the life of the project.

For routine work, such as preventive and corrective maintenance activities, the WCS is the primary vehicle for identifying and controlling hazards. In addition, the WPS also ensures that particularly hazardous operations, such as hot work, confined space work, digging activities, or asbestos abatement, are specifically analyzed, controlled, and authorized before beginning the work activity.

(b) Analyze Hazards

The SARS ensures that hazards are analyzed and that controls for projects, support operations, and facilities are identified and implemented. Other routine work is controlled through the WCS and WPS, which analyze hazards and ensure that appropriate control measures are in place before the work commences.

(c) Categorize Hazards

Unmitigated hazards are categorized through the SARS as to their severity and probability. Mitigation methods to be implemented are documented, along with the resultant risk level. Operations are not permitted to continue with unacceptable risks to line management.

- (3) Develop and Implement Hazard Controls
 - (a) Identify Standards and Requirements

NETL maintains a set of ES&H standards by which ES&H programs are maintained and audited. The list of standards is maintained through the NETL directives process, with input from SARS processes and the regulatory/DOE requirements review process, by adding standards as new hazards or requirements arise or by removing standards if the hazard or requirement no longer exists. These standards are implemented through local policies, plans, procedures, and employee training. These standards are also referred to as the focused standards list (FSL).

Exemptions from any approved standard are requested through the ES&H program managers. Exemptions from consensus standards are approved at the local level. Exemptions from DOE or regulatory requirements are forwarded to DOE-HQ for review and submission to the regulatory authority.

(b) Identify Controls to Prevent and Mitigate Hazards

Following the SARS process, which identifies the hazards and the associated mitigation methods, engineering controls are implemented during the design and construction of the project or facility. The administrative controls and personal protective controls are implemented through procedures and training before and during the life of the project or operation. All efforts are made to control hazards through engineering controls. However, administrative and personal protective controls are implemented implemented when engineering controls are not feasible.

(c) Establish Safety Controls

The safety envelope is established by the SARS and documented in the permit application and operating procedures. Approval of the operating permit is an approval of this safety envelope. For routine activities, the WCS establishes the safety envelope.

(d) Implement Controls

Line management is responsible for implementing identified controls. Controls are documented in procedures and communicated to employees. Oversight is provided by line management to ensure that the controls are being implemented and continue to provide the expected level of protection. Internal audits also help to determine if controls are being followed and are effective.

(4) Perform Work

(a) Confirm Readiness

Prior to startup of any project or operation, the SARS review is approved by line management. This is documented through a construction, operating (for projects and operations), or use (for facilities) permit or other authorization mechanism. The construction permit is valid as long as the project or facility is under construction. The operating permit is valid until a significant change to hazard level or hazard control requires a modification to the permit. The use permit is valid as long as the facility continues to be used for the purpose for which it was approved. The ESS&H Division and the Engineering Research Division jointly conduct annual assessments of permitted operations to determine if projects are operating within their safety envelope and scope of authorization. The Site Operations Division is responsible for oversight of all facility SARS permits.

For routine work, the WCS is used to document the work, the hazards, and the appropriate protective actions to take. Other uniquely hazardous activities such as hot work, confined space, asbestos abatement, or lead abatement require the issuance of a work permit.

Line management is responsible for ensuring that operations are conducted within the approved safety envelope.

(b) Perform Work Safely

All employees are responsible to perform work safely and in accordance with requirements. Line management is responsible for ensuring that the workers are properly trained, equipment is provided and in good working order, operating procedures are correct and available, and that materials to accomplish the work are appropriate and do not present hazards to employees.

Employees who are found to consistently disregard ES&H requirements will be subject to the appropriate disciplinary actions. These procedures include informal reprimands, written reprimands, suspensions, and termination.

Information regarding suspected criminal activity will be forwarded to the appropriate law enforcement agency for action. NETL will not tolerate intentional disregard for the safety of others and will take necessary action to prevent harm to employees, the public, or the environment.

All work conducted on the NETL site for any agency is subject to the same ES&H requirements consistent with the ISMS.

- (5) Feedback and Continual Improvement
 - (a) Collect Feedback Information

Feedback is provided through annual assessments, oversight of the operation by line management, program assessments, and internal and external audits. Changes to standards and processes are made as needed to provide improved levels of safety. Any operation that is not conforming to requirements is stopped until it is brought into conformance.

NETL also collects ES&H performance indicators. These include ISO 14001/OHSAS 18001 metrics, high level institutional ES&H metrics, Office of Institutional Operations metrics, ESS&H Division metrics, and DOE-HQ required metrics.

NETL maintains a lessons learned program that includes a review of lessons from internal and other sources, such as DOE sites, industrial facilities, and trade publications; applies lessons learned within NETL; and tracks the results of the lessons learned program. NETL communicates these lessons to the NETL organization and to DOE.

NETL will report occurrences through the DOE Occurrence Reporting and Processing System (ORPS) in accordance with DOE directives. NETL will also report injury and illness information to the DOE Computerized Accident and Incident Reporting System (CAIRS) in accordance with DOE directives.

(b) Identify Improvement Opportunities

The information collected is analyzed by the ESS&H Division and reported to senior management and the organization. If trends show that the process or system is degrading, improvement plans are developed to bring the process back into conformance with the requirements. Improvement plans are documented, prioritized, and budgeted through the DOE/FE budget process.

Improvement opportunities are also identified from ISO 14001/OHSAS 18001 internal and external audits.

(c) Make Changes to Improve

ES&H program managers have the responsibility for oversight and improvement of their specific ES&H programs. ES&H managers have responsibility for recommending policy and continual improvement initiatives.

Workers are involved in the development and implementation of the ES&HMS. This includes participation in the development and implementation of policies, plans, and procedures; work process and hazard evaluations; and established feedback and continuous improvement processes.

(d) Oversight and Enforcement

Line management has the first responsibility for oversight and enforcement of ES&H requirements. This oversight is accomplished in several ways: informal reviews of operations, site and facility (informal) walkthroughs, formal inspections and assessments, internal and external audits, annual performance appraisals, and other mechanisms deemed appropriate by the responsible line manager. All employees have the authority to stop operations that are immediately dangerous to the life or health of employees or the public or which present potential harm to the environment. Only line management has the authority to restart operations after they are satisfied that the hazard has been addressed satisfactorily.

Onsite support contractors doing work at an NETL site are subject to the same ES&H requirements as DOE employees. Assessment of contractor work performed, including ES&H aspects of that work, is the responsibility of the contracting officer and the contracting officer's representatives. The contracting officer has the authority and responsibility to inform contractors of violations of ES&H requirements and to take necessary action, including contract termination, to ensure that employees, the public, and the environment are not harmed.

e. <u>Component 4: Integrated ES&H Management Mechanisms</u>

NETL ensures that the above functions are carried out through documented processes which set expectations for performance. The following is applied when developing mechanisms:

• Directives are developed and maintained to provide direction to employees and contractors working at NETL sites. The direction includes the processes used to implement ISMS and ensure that the ISMS is integrated with the ES&HMS and its associated processes.

- The primary processes for hazard analysis and control are the SARS, the WCS, and the WPS. These processes are used to identify, analyze, and provide controls for hazards associated with NETL operations.
- ES&H standards are maintained by NETL's ESS&H Division director and supported through SARS/WCS and regulatory/DOE order reviews.
- Additional processes and programs are developed to comply with regulations, DOE requirements, and other standards adopted by NETL.

f. <u>Component 5: Responsibilities for Integrated ES&H Management</u>

This chapter outlines the functions, responsibilities, and authorities for NETL's organization.

(1) NETL ES&H Program Implementation

The functions, responsibilities, and authorities for ES&H program implementation are contained in the matrix in Attachment 1. This organizational matrix shows the responsibilities for each office and division that have some role or responsibility for developing, implementing, maintaining, or overseeing the NETL ES&H Program.

The matrix is based on the following principles:

- Responsibility, accountability, authority, and resources for implementation are located within the organization where the work is performed.
- Site-wide ES&H programs are developed, managed, and implemented by the ESS&H Division, unless otherwise noted on the matrix.
- (2) Interface with External Entities

A second matrix found in Attachment 2 outlines the interfaces between NETL and external entities for the ES&H program. This matrix is based on the following principles:

- The ES&H program managers have general liaison functions on policy issues.
- The ESS&H Division has liaison and reporting functions for those activities for which it is primarily responsible, including program development and implementation functions.

(3) Contractors

Onsite support contractors doing work on the NETL sites are subject to NETL's ES&H requirements. This is documented in contracts and the referenced directives. NETL strives for a unified ES&H program with the same requirements for all employees, regardless of their employer.

g. <u>Component 6: Implementation of Integrated ES&H Management</u>

By implementing this plan, NETL is confident that the principles of ISMS will be fully implemented. Work will be defined and planned and hazards will be identified and controlled. Work will be performed safely, monitored, and assessed. Needed improvements will then be implemented.

This plan is reviewed for effectiveness in conjunction with the NETL's auditing process. Annually, co-incident with the development of NETL's annual ES&H objectives and targets, NETL will declare to the secretary of fossil energy that it is in conformance with the ISMS requirement and provide him with a copy of the next fiscal year's objectives and targets.

Internal verification of the ISMS will occur once every 3 years in conjunction with the full external surveillance ISO 14001 and OHSAS 18001 audits. Continued certification to the ISO 14001 and OHSAS 18001 standards is considered sufficient to ensure that ISMS requirements are being implemented.

<u>RESPONSIBILITIES</u>

a. <u>ESS&H Division Director</u>

- (1) Ensures that all ES&H programs developed are in accordance with the principles contained within the plan.
- b. <u>Deputy ESS&H Division Director</u>
 - (1) Acts as ISM champion and ES&HMS representative for NETL.
- c. <u>Safety and Health Team Leader</u>
 - (1) Ensures that the plan is maintained, reviewed annually, and updated as needed.
- d. <u>Line Managers</u>
 - (1) Ensure that their ES&H functions, responsibilities, and authorities as contained in the plan are implemented.

4.

e. <u>Employees</u>

(1) Carry out their ES&H responsibilities identified in the plan and in all integrated safety management directives that support the plan.

5. **<u>REQUIREMENTS</u>**

- a. DOE Policy 411.1, <u>Safety Management Functions</u>, <u>Responsibilities and Authorities</u> <u>Policy</u>.
- b. DOE Policy 450.4, <u>Integrated Safety Management Policy</u>.
- c. DOE Policy 450.7, Environment, Safety, and Health (ES&H) Goals.
- d. DOE Manual 411.1-1, <u>Safety Management Functions, Responsibilities, and Authorities</u> <u>Manual</u>.
- e. DOE Manual 450.4-1, Integrated Safety Management System Manual.
- f. Office of Fossil Energy, Commitment to Environment, Security, Safety and Health, November 2006.
- g. NETL Order 421.1, <u>Safety Analysis and Review System</u>.
- h. NETL Order 440.1, <u>Safety and Health Program</u>.
- i. NETL Order 436.1, <u>Departmental Sustainability</u>.
- j. NETL Order 450.4, <u>Integrated Safety Management Program</u>.

REFERENCES

- a. NETL Procedure 421.1-00.01, <u>R&D Safety Analysis and Review System</u>.
- b. NETL Procedure 421.1-00.02, <u>Support Operations Safety Analysis and Review System</u>.
- c. NETL Procedure 421.1-00.03, <u>Facility Safety Analysis and Review System</u>

7. **DEFINITIONS**

a. None.

6.

8. **<u>REVISION HISTORY</u>**

VERSION	DATE	SUMMARY OF CHANGES
Original	5/23/00	The purpose of this plan is to establish the NETL environment, safety and health (ES&H) functions, responsibilities, and authorities that support the Integrated Safety Management Program.
A	9/20/02	These revisions reflect changes in the NETL organizational structure and the resulting changes in ES&H functions, responsibilities, and authorities. This revision was also required due to DOE's policy to update the ES&H functions, responsibilities, and authorities manual (FRAM) on a periodic basis. Also, the crosswalk between the NETL FRAM and DOE-HQ FRAM has been removed from the operating plan to make this document more readable. The crosswalk will be updated and will be placed separately on the intranet for informational purposes.
В	12/23/02	These revisions reflect changes in the NETL integrated safety management (ISM) policy. The policy was updated to incorporate the environmental management system (EMS) into the ISM infrastructure. The 1998 ES&H policy memorandum was also removed from the document.
C	10/15/03	These revisions reflect changes in the ES&H integrated safety management plan that incorporate provisions involving the environmental management system (EMS) at the laboratory, and updates references and other ES&H program implementation activities.
D	9/17/04	These revisions reflect changes in the ES&H integrated safety management plan that incorporate provisions involving the new requirements for Department of Energy ES&H goals and recent NETL organization changes.
E	4/2/08	Major revisions were made to conform to updated DOE requirements and the requirement to develop an ISM description. Other minor changes were made for clarity and accuracy.
F	7/16/10	Minor changes were made to address finding 350-2009-0052. Other changes were made to include the annual requirement to declare the ISM in conformance, to identify the ISM champion (deputy ESS&H director as part of his duties as ES&H MS representative), and the inclusion of DOE Manual 450.4-1 in the list of requirements.
G	5/29/14	The approving official was updated; no other changes were made.

NETL ES&H FUNCTIONS, RESPONSIBILITIES, AND AUTHORITIES

ES&H Functions, Responsibilities, and Authorities

			Office/Division		
Director/Chief Operating Officer	SCC/OSAP/ SCNGO/PMC	ORD	ΟΙΟ	ESS&H Division	Site Operations Division
		Program	Planning and Dev	velopment	
Approves ES&H orders.			Director approves NETL ES&H directives.	Sponsors development of NETL ES&H orders, oper- ating plans, and proce- dures. Establishes ES&H goals and performance measures.	
	Develops SCC/ OSAP/SCNGO/ PMC ES&H programs/proce- dures based on NETL policy.	Develops ORD ES&H programs/ procedures based on NETL policy.		Develops site-wide ⁴ ES&H programs/procedures based on NETL policy.	Develops SOD ES&H programs/procedures base on NETL policy.
	Participates in relevant ES&H program/ procedure development.	Participates in relevant ES&H program/ procedure development.		Participates in relevant ES&H program/procedure development.	Participates in relevant ES&H program/procedure development.
		Coordinates with other relevant NETL offices in development of ORD ES&H programs/ procedures.		Coordinates with other relevant NETL offices in development of site-wide ES&H programs/ procedures.	Coordinates with other relevant NETL offices in development of SOD ES&H programs/ procedures.
				Reviews, coordinates, and tracks revisions to ES&H procedures.	
Develops ES&H mission and policy.				Provides input to senior management on ES&H policies.	
Approves and issues ES&H policies.				Provides oversight of ES&H standards to ensure they are relevant and consistent.	
Provides legal counsel on ES&H issues.					

⁴ The term "site-wide" means ES&H programs that are not otherwise specifically assigned to organizations in other blocks of the table and includes the following as examples: chemical inventory and MSDS management, non-hazardous waste management (e.g., recycling), site-wide (general) HAZCOM, and lead and asbestos abatement activity.

Office/Division					
Director/Chief Operating Officer	SCC/OSAP/ SCNGO/PMC	ORD	010	ESS&H Division	Site Operations Division
Provides general oversight of the NETL ES&H standards and requirements identification and maintenance process. Appoints ES&H representative. Approves ES&HMS policy. COO designated as ES&HMS steward and			COs/CORs will incorporate an applicable ES&H standards and requirements list as contractual requirements in major onsite SSC procurements.	Develops and maintains NETL ES&H Focused Standards List. Develops and maintains a register of NETL directives. Deputy division director is designated as ES&HMS representative.	
champion.	sonnel to seek resolution of ES&H concerns with first-line supervisors or through existing complaint or dis- pute resolution systems. Assists in the resolution of employee ES&H concerns and cooperates with assessments used to verify the organization has acted to mini- mize, correct, or prevent recur- rence of a	Encourages per- sonnel to seek resolution of ES&H concerns with first-line supervisors or through existing complaint or dis- pute resolution systems. Assists in the resolution of employee ES&H concerns and cooperates with assessments used to verify the organization has acted to mini- mize, correct, or prevent recur- rence of a situation that precipitated a valid concern.	Encourages per- sonnel to seek resolution of ES&H concerns with first-line supervisors or through existing complaint or dis- pute resolution systems. Assists in the resolution of employee concerns and cooperates with assessments used to verify the organization has acted to mini- mize, correct, or prevent recur- rence of a situation that precipitated a valid concern.	Develops Employee Con- cern Program (ECP) pro- cesses, procedures to report concerns. Maintains ECP tracking system and a secure filing system. Prepares quarterly and annual reports and reviews them for lessons learned and possible trends.	Encourages personnel to seek resolution of ES&H concerns with first-line supervisors or through existing complaint or dis- pute resolution systems. Assists in the resolution o employee ES&H concerns and cooperates with asses ments used to verify the organization has acted to minimize, correct, or pre- vent recurrence of a situa- tion that precipitated a valid concern.

ES&H Functions, Responsibilities, and Authorities

	Office/Division				
Director/Chief Operating Officer	SCC/OSAP/ SCNGO/PMC	ORD	ΟΙΟ	ESS&H Division	Site Operations Division
Delegates stop work and restart authority for NETL operations.	if a clear and present ES&H danger exists and promptly notifies ESS&H DD.	present ES&H danger exists and promptly notifies	if a clear and present ES&H danger exists and	exists and promptly notifies ORD, SOD, SSC,	Shuts down work if a clear and present ES&H danger exists and promptly notifies ES&H, ORD, SSC, and/or CO as necessary. Determines the appropriate level of readiness for the startup of operations.

ES&H Functions, Responsibilities, and Authorities

	aggios to:		Office/Division		
	SCC/OSAP/	0.00	010		Site Operations
Director	SCNGO/PMC	ORD	OIO	ESS&H Division	Division
			gram Implementa	ition	
Accepts responsi-		Office director	Office director		
oility for ES&H	accepts respon-	accepts respon-	accepts responsi-		
performance of	sibility for ES&H	sibility for ES&H	bility for ES&H		
NETL.	performance of	performance of	performance of		
	SCC/OSAP/	ORD.	OIO.		
	SCNGO/PMC.				
	Manages budget	Manages budget of ORD ES&H		Manages budget of site-	Manages budget of SOI
	of SCC/OSAP/ SCNGO/PMC			wide ES&H programs and activities.	ES&H programs and activities.
		programs and activities.		activities.	activities.
	ES&H programs and activities.	activities.			
Appoints authori-	and activities.	Assigns indi-		Appoints authorities (i.e.,	Assigns individuals
ies (i.e., NCO,		viduals respon-		AHJ).	responsible for SOD
signature		sible for ORD		AID).	ES&H programs (points
authority).		ES&H programs		Assigns individuals	of contact).
iumonty).		(points of		responsible for site-wide	of contact).
		contact).		ES&H programs (points of	
		contact).		contacts).	
				contacts).	
				Manages ISM, lessons-	
				learned, QA, ORPS,	
				CAIRS, and ES&H	
				oversight budgets.	
Provides NETL					
ES&H spokes-					
berson for					
emergency					
preparedness.					
mplements	Implements	Implements	Implements	Implements ES&H	Implements ES&H
ES&H	ES&H	ES&H	ES&H	procedures.	procedures.
procedures.	procedures.	procedures.	procedures.		
	Maintains aware-	Manages contrac-		Manages contractor	Manages contractor
	ness of ES&H	tor resources for		resources for site-wide	resources for SOD ES&
	aspects of con-	ORD ES&H		ES&H programs.	programs.
	tracted R&D	programs.			
	activities.				
	Prepares NEPA	Prepares NEPA			Prepares NEPA docume
	documentation	documentation		tation for ES&H Division	tation for SOD projects.
	for SCC/OSAP/	for ORD projects.		projects.	
	SCNGO/PMC				
	projects.			Coordinator of the 11	
		Trains ORD		Coordinates site-wide	Trains SOD employees
		employees on		ES&H training.	on SOD project specific
		R&D project specific hazards.			hazards.
	Dute oppropriate	specific nazards.	Dovelops and	Manages site-wide ES&H	Minimizaa waata
	Puts appropriate ES&H require-		Develops and manages ES&H		Minimizes waste.
	ments into con-		directives control	programs.	
	tracted R&D.		system (policy	Manages lessons learned,	
	uatitu K&D.		related).	ORPS, and CAIRS	
			icialeu).		
				programs.	

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	SCC/OSAP/		Office/Divisi		Site Operations
Director	SCNGO/PMC	ORD	OIO	ESS&H Division	Division
				Provides regulatory over- sight of wastewater treat- ment facility.	Manages wastewater treatment facility.
Approves envi- ronmental assess- ments. Approves CXs (NCO).	Manages NEPA program.	Minimizes waste and chemical inventories.		Manages and provides oversight of hazardous waste facility. Manages inactive waste site remediation.	
ens (NCO).				Manages recycling and pollution prevention programs. Reviews, approves, and	
				processes ES&H exemp- tion requests for NETL. Coordinates statutorilly-	
				required information gathering for site-wide ES&H programs (reporting and permits).	
				(Manages NEPA documen- tation preparation upon request.)	
				Provides consultation to NEPA document managers and project managers.	
				Manages lead and asbestos abatement in collaboration with SOD. Manages chemical inven-	
				tory system, MSDS information. Provides site-wide	
				HAZCOM program and communication. Supports accident/incident	
				investigations.	

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			Office/Division	1	
	SCC/OSAP/				Site Operations
Director	SCNGO/PMC	ORD	ΟΙΟ	ESS&H Division	Division
		Oversight, As	ssessment, Auditi	ng, Inspections	
	Self-assessment of SCC/OSAP/ SCNGO/PMC ES&H activities.	Self-assessment of ORD ES&H activities.	Self-assessment of all ES&H activities.	Self-assessment of ES&H activities.	Self-assessment of ES&F activities.
	Provides ES&H performance information upon request.	Provides ES&H performance information upon request.		Provides ES&H perfor- mance information upon request.	Provides ES&H perfor- mance information upon request.
			Conducts or coordinates ES&H site-wide performance audits for NETL activities.	Conduct ES&H inspections (e.g., OSHA, chemical hygiene, and construction activities).	
Reviews and acts on ES&H performance.			activities.	Reports to NETL senior staff and HQ on NETL ES&H performance. Provides human resources for ES&H assessments (subject matter experts). Reviews construction designs for ES&H concerns. Performs regulatory ES&H program self-assessments.	
COO reports ES&HMS per- formance to senior staff at management review meetings.				Division director reports ES&HMS performance to senior staff at management review meetings. Acts as assessors in auditing achievement of ES&HMS objectives/targets and	

ES&H Functions, Responsibilities, and Authorities

	·		Office/Division	l	
Director	SCC/OSAP/ SCNGO/PMC	ORD	ΟΙΟ	ESS&H Division	Site Operations Division
			R&D Operations	5	
		R&D SARS pro-		Provides consultation and	
		cess caretakers.		review of R&D SARS	
				packages.	
		Appoints ERD			
		representatives			
		for R&D SARS.			
		Initiates R&D		Provides ES&H representa-	
		SARS packages.		tives and assessors to R&D	
				SARS processes.	
		Office director			
		approves ORD			
		SARS packages.			
		Establishes and			
		maintains project			
		operating pro-			
		cedures for R&D			
		operations.			

	ES&H Functions,	Responsibilities,	and Authorities
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Office/Division Site Operation					
Director	SCNGO/PMC	ORD	ΟΙΟ	ESS&H Division	Division
		Facilities, Sup	port Operations,	and Properties	·
		Approves all		Provides consultation and	Approves all modifica
		modifications to		review of facility and	tions to NETL propert
		R&D property		support operation SARS	(e.g., facilities and
		(e.g., facilities		packages.	buildings).
		and buildings).			
		Coordinates all		Provides ES&H represen-	Coordinates all facility
		R&D facility		tatives and assessors to	changes.
		changes with		facility and support opera-	
		SOD.		tion SARS processes.	
		Analyzes and			Analyzes and controls
		controls ORD			SOD hazards.
		hazards.			
		Jointly with SOD			
		establishes a split			
		of facilities			
		responsibilities.			
		Jointly with SOD			
		establishes a			
		split of utilities			
		responsibilities			
		related to ES&H.			
		Consults and	Office director	Provides consultation and	Coordinates the develo
		coordinates with	approves facility	review for facility con-	ment of and manages
		ES&H and SOD	SARS packages.	struction and use (Facility	NETL facility configu
		Divisions on		SARS).	tion management proc
		ORD construction activities.			
		activities.		Provides guidance for site-	Coordinates network f
				e e	site-wide alarms.
				(gas alarms).	site-while alaritis.
				(gas alarins).	Maintains facility reco
					and drawings.
				Monitors ES&H aspects of	Develops and impleme
				offsite properties.	facility operating
				silence properties.	procedures.
				Provides consultation and	Coordinates design an
				review for support operation	
				SARS.	activities with ES&H
					Division.
		Generates support	Generates support	Generates support operation	
		operation SARS	operation SARS	SARS for support activities	tion SARS for support
		for support activi-		under their management.	activities under their
		ties under their	ties under their		management.
		management.	management.		
					Facility SARS process
					caretakers.
					Initiates facility SARS
					packages.

	ES&H Functions,	Responsibilities, and	nd Authorities
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	SCC/OSAP/				Site Operations
Director	SCNGO/PMC				Division
U	SCNGO/PMC	Completes cor-	for OIO. Validates/verifies performance of completed cor- rective actions. Coordinates formal responses	ESS&H Division Committees Communicates lessons learned to appropriate NETL employees. Maintains databases and records for site ES&H conditions and assigned performance measures. Maintains databases on ES&H standards, perfor- mance measures, and performance trends. Maintains an ES&H corrective action tracking system. Analyzes ES&H databases for performance trends. Maintains an audit and inspection database and regulatory compliance database. Completes corrective actions for ES&H Division. Appoints ES&H represen- tatives to ES&HMS cross- cutting team. Interfaces with HQ on ES&H issues and initiatives within (NETL's) area of responsibility. Provides input to formal responses to HQ on ES&H directives (e.g., policies and orders).	Division Maintains databases for site maintenance activities. Completes corrective actions for Site Ops Division. Identifies responsible
		Identifies respon- sible officials for work spaces and operations.		Coordinates cross-office/ division aspects of ES&H.	officials for work spaces and operations. Coordinates GPP and ES&H projects with OR and ES&H.

ES&H Functions, Responsibilities, and Authorities

	Office/Division							
	SCC/OSAP/				Site Operations			
Director	SCNGO/PMC	ORD	OIO	ESS&H Division	Division			
		Provides tech-		Provides ES&H policy and	Coordinates periodic			
		nology consulta-		NEPA consultation services	ES&H-related operating			
		tion on ES&H		to NETL employees (e.g.,	and maintenance activity			
		issues.		SARS, OSHA, etc.).	meetings with ORD and			
					ES&HD.			
				Facilitates public interac-				
				tions related to ES&H.				

ES&H Functions, Responsibilities, and Authorities

	Office/Division						
	SCC/OSAP/				Site Operations		
Director	SCNGO/PMC	ORD	OIO	ESS&H Division	Division		
		Continuous Im	provement and C	orrective Action			
		Develops and		Develops and prioritizes	Develops and prioritizes		
		prioritizes ORD		ES&H Division's corrective	SOD's ES&H corrective		
		ES&H corrective		actions.	actions.		
		actions.					
				Oversees NETL ES&H			
				corrective action tracking			
				system.			
		Recommends		Provides ES&H bench-	Recommends new or		
		new or modifi-		marking information.	modifications to design		
		cations to			standards affecting ES&H		
		design standards			(e.g., factor of safety).		
		affecting ES&H					
		(e.g., factor of					
		safety).					
				Manages and oversees	Establishes maintenance		
					priorities considering		
				ment process and initiatives.			
					Implements ES&H-		
					related improvements and		
					corrective actions to		
					infrastructure (e.g.,		
					ventilation).		

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ATTACHMENT 2

ORGANIZATIONAL FUNCTIONS FOR ES&H LIAISON BETWEEN NETL AND OUR CUSTOMERS

LIAISON ITEM	PRINCIPAL NETL POC	NOTIFICATIONS (Within NETL)	ACTION	DISTRIBUTION (Within NETL)	DISTRIBUTION (Outside NETL)
					· · · · · · · · · · · · · · · · · · ·
Proposed Legislation	DD	DD and SMEs	OIO with SME	DD and SMEs	EH
Review			and DD input		FE-7
D					Others as needed
Regulator	SMEs	DD and SMEs	SMEs	DD and SMEs	Regulator
Coordination					Local
					Municipality
DOE Order	DD	DD and SMEs	OIO with SME	DD and SMEs	FE-7
and Policy			and DD input		
Correspondence					
FE Pipeline	DD	SMEs	DD with SME	All ES&H staff	FE-7
(ES&H Newsletter)			input		
Weekly ES&H	DD	All ES&H staff	DD with input	All ES&H staff	FE-7
Report					
Periodic OSHA	SHM	DD and SMEs	SHM with SME	DD	INEL and FE-7
Reports (e.g.,			input	OIO director	
CAIRS and FEOSH)					
ORPS Reports	Facility	Facility	Facility manager	Facility	INEL
	manager	representative		representative	HQ ORPS
	for ORPS	for ORPS		DD	program
					manager
					FE-7
					Regulator
					Municipality
Periodic ES&H	DD	SMEs	DD with SME	SMEs	FE-7, EH, EM
Reports			input		INEL, Regulatory
					Agency
					(as appropriate)
ES&H	DD	SHM and EM	DD, SHM,	As needed	FE-7
Conference Call			and EM		All FE sites
Performance	DD	SMEs	DD with SME	Senior staff and	FE-7
Indicators			input	SMEs	
Meetings and	DD	SMEs	DD and SMEs	SMEs	
Conferences					
Budget	DD	SHM, EM, and	DD	SHM, EM, and	FE-7
Coordination		SMEs as needed		SMEs as needed	
ES&H Management	DD	SHM, EM, and	DD	SHM, EM, and	FE-7
Plan		SMEs as needed		SMEs as needed	

The most recent and official controlled hard copy version of this directive resides with the directives manager. An electronic version of the controlled directive has been placed on the NETL intranet for employee use. Printed hard copies of this electronic version are considered noncontrolled documents.

DD — Division Director, ESS&H

SHM — Safety and Health Manager

EM — Environmental Manager

SME — Subject Matter Expert

OIO — Office of Institutional Operations