

**U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE**

**SAFETY MANAGEMENT FUNCTIONS,
RESPONSIBILITIES, AND AUTHORITIES MANUAL**



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**DOE/WIPP 98-2287
REVISION 8**

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ACRONYMS

ABSTA	Authorization Basis Senior Technical Advisor
AMO	Assistant Manager for Operations
CAP	Corrective Action Plan
CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
CO	Contracting Officer
CRADS	Criteria Review and Approach Documents
CSO	Cognizant Secretarial Officer
CTAC	Carlsbad Field Office Technical Assistance Contractor
DSA	Documented Safety Analysis
DEAR	Department of Energy Acquisition Regulation
DEP	CBFO Deputy Manager
DNFSB	Defense Nuclear Facilities Safety Board
DOE	U. S. Department of Energy
DOT	U. S. Department of Transportation
EM	Office of Environmental Management
EMS	Environmental Management System
EPA	U. S. Environmental Protection Agency
ES&H	environment, safety, and health
FAR	Federal Acquisition Regulations
FEM	Field Element Manager
FRA	Safety Management Functions, Responsibilities, and Authorities (document)
FEOSH	Federal Employees Occupational Safety and Health Program
FRAM	Safety Management Functions, Responsibilities, and Authorities Manual
HSS	Office of Health, Safety, and Security
ISMS	Integrated Safety Management System
LANL	Los Alamos National Laboratory
LPSO	Lead Program Secretarial Officer
M&O	management and operating
MGR	CBFO Manager
NEPA	National Environmental Policy Act
NCO	NEPA Compliance Officer
NRC	Nuclear Regulatory Commission
OA	Office of Independent Oversight and Performance Assurance
OEI	Office of Enforcement and Investigation
ORPS	Occurrence Reporting and Processing System
ORR	Operational Readiness Review
PAAA	Price-Anderson Amendments Act
PDP	Performance Demonstration Program
PSO	Program Secretarial Officer
QAP	Quality Assurance Program
QAM	Quality Assurance Manager
RCRA	Resource Conservation and Recovery Act
RH	remote-handled

S/RID	Standards/Requirements Identification Document
SNL	Sandia National Laboratories
STD	standard
STSM	Senior Technical Safety Manager
TRU	transuranic
USQ	unreviewed safety question
WIPP	Waste Isolation Pilot Plant

1.0 INTRODUCTION

The Department of Energy (DOE) Carlsbad Field Office (CBFO) is committed to implementing an Integrated Safety Management System (ISMS) that is designed to protect the safety of the workers, the public, and the environment. The DOE owns and oversees the operation of the Waste Isolation Pilot Plant (WIPP), a deep geologic repository for transuranic (TRU) waste generated by atomic energy defense activities.

1.1 Purpose

The CBFO Safety Management Functions, Responsibilities, and Authorities Manual (FRAM) is a consolidated document that describes direct lines of responsibility and authority for the office's safety management functions consistent with DOE Manual 411.1-1C, *Safety Management Functions, Responsibilities, and Authorities Manual* (the DOE Level 1 FRAM), and the DOE Office of Environmental Management (EM) *Safety Management Functions, Responsibilities, and Authorities (FRA)* document. Figure 1 is a graphical representation of safety management functions. The provisions of this manual apply to all CBFO organizational elements and reflect the organization as approved by DOE Headquarters. The Standards/Requirements Identification Document (S/RID) contains references applicable to safety management at the WIPP.

1.2 General Responsibilities

The general administrative responsibilities within CBFO related to safety management are described in this section. Figure 2 presents the organization and reporting structure of the CBFO. Section 3 discusses ISMS functions and responsibilities. Table 1 presents the responsibilities and levels of authority for each ISMS function for the Office of the Manager, the Office of Quality Assurance, the Assistant Manager for Operations, the Office of Site Operations, the Office of the National TRU Program, and the Office of Business.

1.2.1 CBFO Manager

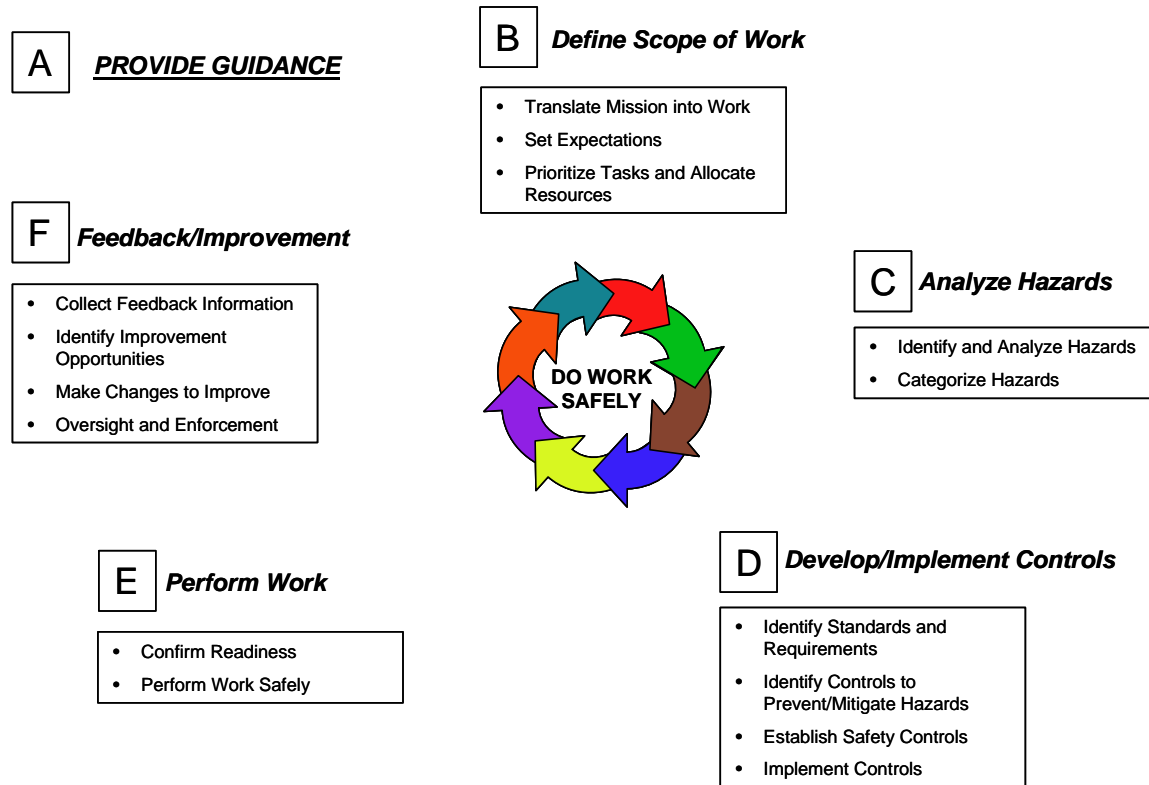
The CBFO Manager (MGR) directs CBFO activities to effectively and efficiently implement DOE and CBFO missions and safety expectations. The CBFO Manager reports to the Assistant Secretary for Environmental Management (EM-1) through the Chief Operating Officer (EM-3). The CBFO Manager shall qualify as a Senior Technical Safety Manager (STSM), if in the 801 or 1301 Series.

1.2.2 CBFO Deputy Manager

The CBFO Deputy Manager (DEP) reports directly to the CBFO Manager and serves as the CBFO Chief Operating Officer in administering the daily activities of the CBFO and WIPP. The Deputy Manager has specific senior management oversight responsibility to ensure that the offices of the CBFO are performing in a manner that meets DOE and WIPP missions. The Deputy Manager shall qualify as an STSM. The Deputy Manager is the CBFO primary point of contact with the Defense Nuclear Facilities Safety Board (DNFSB).

Figure 1. Safety Management Functions

Safety Management Functions



1.2.3 Authorization Basis Senior Technical Advisor

The primary function of the designated Authorization Basis Senior Technical Advisor (ABSTA) is to integrate the development and implementation of safety authorization basis (AB) documents, processes, and procedures including Nuclear Regulatory Commission (NRC) Certificates of Compliance for transportation casks, and the S/RID. The WIPP safety AB documents must be integrated with other authorization documents, which include the permits, licenses, certifications, approvals, agreements, and associated programmatic documents that authorize WIPP to perform TRU waste operations while protecting workers, the public, and the environment. Major environment, safety, and health (ES&H) elements that must be integrated with the safety AB include National Environmental Policy Act (NEPA) documents, the Resource Conservation and Recovery Act (RCRA) Permit, the Environmental Protection Agency (EPA) Compliance Certification, and NRC Certificates of Compliance..

1.2.4 Assistant Manager for Operations

The Assistant Manager for Operations (AMO) provides day-to-day operational oversight within the CBFO. The AMO assists the CBFO Manager and Deputy Manager in the management of TRU waste characterization, packaging, transportation, acceptance, handling, and disposal. The AMO is also responsible for development and execution of policies, programs, and procedures for assigned responsibilities. The AMO is designated as an STSM position. The AMO directs, manages, and supervises the staff in the Office of the Assistant Manager, as well as the Directors for the Office of Site Operations and the Office of the National TRU Program.

1.2.5 Office Directors

Through an integrated management system, the Directors for the Office of Site Operations, Office of the National TRU Program, and Office of Business develop, review, direct, and administer programs, functions, and policies under their purview. The Office Directors also:

- Ensure that products and activities are consistent with the stated CBFO mission, policies, and procedures
- Establish, interpret, and implement policies within functional areas of responsibility where no DOE policy exists
- Provide executive leadership and management direction to the personnel of the offices for which they are the directors
- Serve as first-level supervisors for subordinates
- Select, train, assign, direct, and develop employees in accordance with pertinent policies and procedures
- As designated by the Manager, serve as CBFO spokespersons when addressing contractor management, DOE Headquarters, independent oversight boards, regulators, the media, and the public
- Obtain resources and administrative support for subordinate organizational units
- Ensure that a strong quality and safety culture is integrated fully into the day-to-day activities of CBFO employees and demonstrate a commitment to the highest standards of quality and safety, health, and environmental protection
- Support and participate in management programs and practices, such as performance-based management, employee concerns, quality improvement plans, affirmative action, and equal employment opportunity
- Support the prevention of waste, fraud, and abuse

1.2.6 Quality Assurance Manager

The Quality Assurance Manager (QAM) has the programmatic responsibility and lead for the CBFO Quality Assurance Program. The QAM reports to the CBFO Manager's Office and has direct access to the Manager and the Deputy Manager regarding QA matters. The QAM

performs quality assurance oversight of WIPP participants to verify that CBFO quality assurance program requirements are understood and implemented.

1.2.7 Facility Representative

The WIPP is a Category 2 non-reactor nuclear facility; therefore it has a formal facility representative program in accordance with DOE Standard (STD) 1063-2006, *Facility Representatives*.

Facility representatives must have independent and direct access to contractor personnel, facilities, and records, as necessary, to carry out their assigned responsibilities. Facility representatives have access to program/line managers to provide information related to the WIPP program facilities.

CBFO line management is responsible for safety, and well-trained facility representatives are an important resource for ensuring safe operations. Facility representatives perform safety-related oversight to ensure:

- the contractor operates facilities safely and efficiently (i.e., within the boundaries of those controls invoked in the facility authorization basis);
- contractor management systems effectively control conduct of operations and implement Integrated Safety Management (ISM) objectives, principles, and functions;
- DOE line/program managers are informed of operational performance; and
- effective lines of communication between DOE and the operating contractor are maintained during periods of normal operation and following reportable events, in accordance with DOE Orders and requirements.

2.0 CBFO MISSION AND SUPPORT ORGANIZATIONS

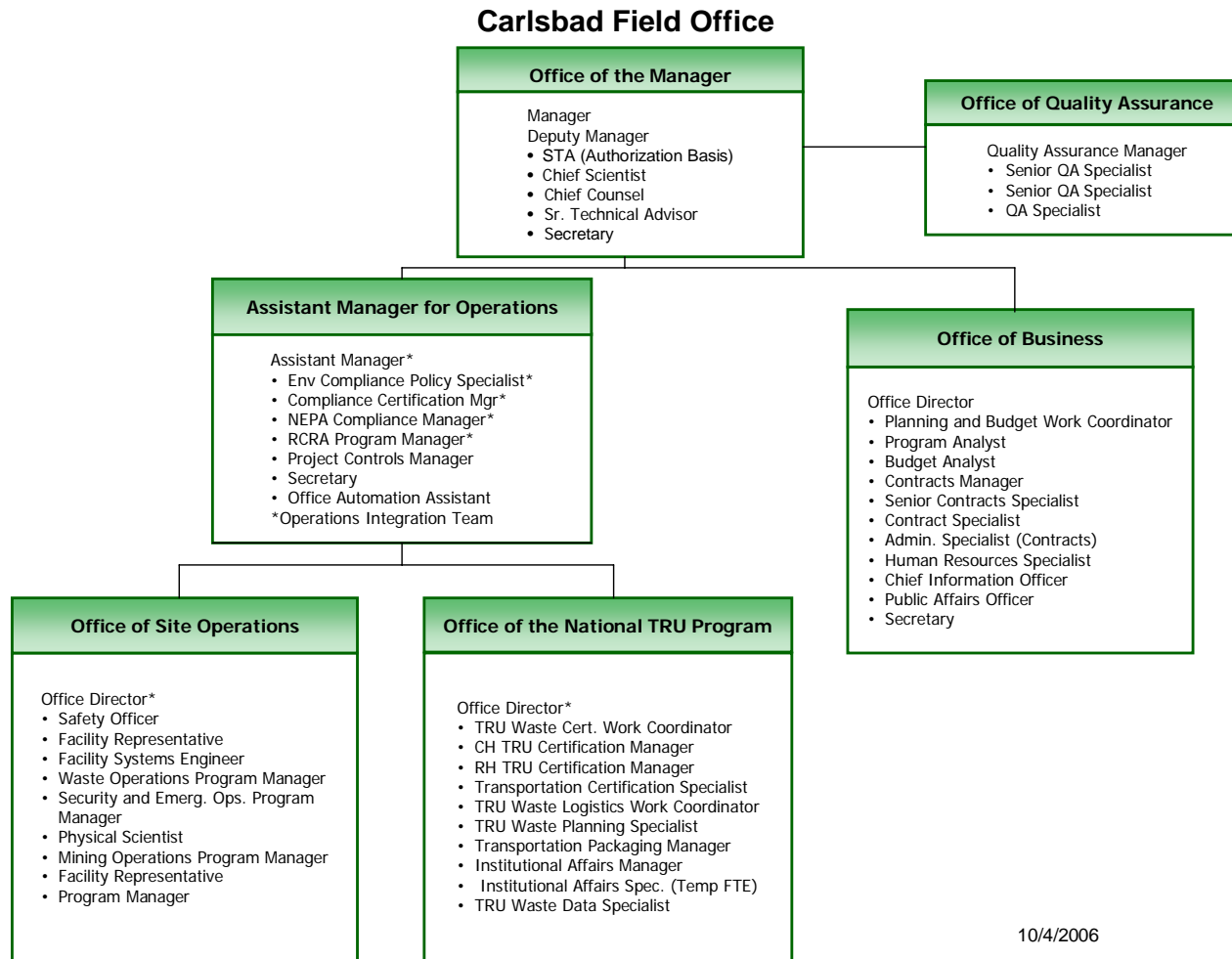
The primary mission of the CBFO is to protect human health and the environment by operating the WIPP program in a manner that results in the safe disposal of defense TRU waste and to establish an effective system for the management of TRU waste from characterization to disposal. The CBFO develops and directs implementation of the CBFO TRU waste program, assesses compliance with the program guidance, and reviews activities and assumptions among all defense TRU waste sites for characterization and transportation of TRU waste for disposal at WIPP. The CBFO prepares and coordinates plans for the management of TRU waste disposed at WIPP.

WIPP is designed to permanently dispose of TRU waste generated in whole or in part by atomic energy defense activities. As such, it is the cornerstone of the DOE's defense TRU waste program. To achieve the regulatory approval for waste disposal operations, the CBFO develops waste acceptance criteria, performs audits and certifies sites to characterize and package the waste, provides for the safe transportation of the waste from the sites to the WIPP, and disposes of the

waste in the repository. The CBFO maintains an active public outreach program to keep stakeholders informed of the progress of all activities.

The WIPP management and operating (M&O) contractor manages the operation of the WIPP site, including ES&H functions, permitting, transportation management, generator sites services, support to experimental programs, planning, and quality assurance. Sandia National Laboratories (SNL) conducts experimental programs and performance assessment activities required to show that the waste disposal system can safely isolate TRU wastes from the environment for at least 10,000 years. Los Alamos National Laboratory (LANL) provides technical support in the areas of TRU waste characterization and transportation, National TRU Program optimization, the TRU waste inventory, and experimental and actinide chemistry programs. The CBFO Technical Assistance Contractor (CTAC) provides quality assurance auditing and assessment for site certification, provides the Performance Demonstration Program (PDP), and assists CBFO with safety oversight, environmental compliance and other technical, managerial, or staff support as requested.

Figure 2. CBFO Organization Structure Carlsbad Field Office



3.0 ORGANIZATIONAL FUNCTIONS AND RESPONSIBILITIES FOR SAFETY

DOE organizational units are assigned primary functions as described in various elements of applicable public laws, federal regulations, DOE Directives (Policies, Orders, Manuals, Notices, Guides, and Standards), and CBFO documents. When responsibility for a function is not clearly defined in this manual, the CBFO Manager's Office will assign functional leads.

Table 1 describes the CBFO ISMS functions and the associated drivers. It identifies the responsibilities and authorities of the CBFO Manager's Office and the sub-organizational units. The table also lists implementing procedures and documents for the safety management functions. Each organizational element should be cognizant of its safety management functions and responsibilities and take effective actions to implement this system.

Table 1
Matrix of CBFO Safety Management Functions, Responsibilities, and Authorities

Table 1 describes the CBFO safety management functions, responsibilities, and authorities, along with their drivers and implementing procedures/documents. The abbreviations used in the table to describe the responsibilities and authorities are defined below.

APPROVE (A): Responsible for final approval of a document, schedule, change request, exemption request, proposed action, etc. Authority to approve may be delegated wherever this is not prohibited. When authority to approve is delegated, the responsible official does not need to concur or review. In delegations, the responsible official should monitor the delegated authority's outcomes. Responsibility always remains with the original official and cannot be delegated.

CONCUR (C): Responsible for the review of a document, schedule, proposed action, exemption, request, etc., and for recommending approval or rejection to the official having approval authority. Concurrence is an explicit agreement to assume an active role in the success of the proposed activity or document. The originating office may specify a date by which non-concurrence must be received.

IMPLEMENT (I): Responsible for executing the functions and/or compliance with rules, orders, or other direction and for the collection of data and issuance of reports.

LEAD (L): Primary lead organization or individual for the operation, activity, or function. May or may not have other organizations or individuals in a support role for the activity. Primary responsibility for the activity and for ensuring appropriate and timely completion.

MONITOR (M): Responsible for appraisals, audits, oversight, and assessments that monitor contractor and DOE activities, programs, and products and for implementation of actions and programs.

PREPARE (P): Responsible for preparing documentation, initiating a standard or guidance document, developing acceptance criteria, issuing a document, and establishing a program and procedure for its implementation.

SUPPORT (S): Provides support to the lead organization or individual for the function or task to reflect the support organization's or individual's area of responsibility. Secondary responsibility for appropriate and timely completion.

Table 1. Matrix of CBFO Safety Management Functions, Responsibilities, and Authorities

ISMS FUNCTIONS	DRIVER	RESPONSIBILITIES AND AUTHORITIES			CBFO IMPLEMENTING PROCEDURES/ DOCUMENTS	
		Delegated CSO Authorities	Office of the CBFO Manager	CBFO Offices*		
I. Provide Directions						
Field Element Managers (FEMs) are responsible for monitoring and assessing day-to- day performance under the contracts.						
I.1. Cognizant Secretarial Officer (CSO) Mission Assignment to Field Elements Review, provide input to, and implement program guidance developed by the Program Secretarial Officer (PSO).	DOE P 411.1, <i>Safety Management Functions, Responsibilities, and Authorities Policy</i> , DOE M 411.1-1C, <i>DOE Safety Management FRAM</i> , DOE/EM FRA Document		MGR/DEP – A, I	Each Office	P, C, I	DOE/CBFO 03-3293, <i>CBFO Program Execution Plan</i> , DOE/WIPP 04-3300, <i>WIPP Project Control System Description</i>
I.2. Budget for Program Participate in preparation of the proposed budget and provide input to PSO on the adequacy of the proposal to support missions and safety initiatives.	DOE O 130.1, <i>Budget Formulation</i>		MGR/DEP – A, I	Business Each Office	L, P, I, M S, C, I, M	DOE/WIPP 04-3300, CBFO-95-1122, <i>Baseline Change Control Process</i>
I.3. Budget for Environment, Health and Safety Infrastructure Participate in preparation of the proposed budget and provide input to PSO on the adequacy of the proposal to support landlord activities and safety initiatives; implement corrective actions and safety improvements.	DOE O 130.1		MGR/DEP – A, I	Business Operations	L, P, M S, C, I, M	CBFO-98-3167, CBFO-95-1122

* The term Operations, as used here, encompasses the Assistant Manager for Operations Office, the Office of Site Operations, and the Office of the National TRU Program.

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I.4. Resource Allocations to FEM Review the proposed allocations and provide input to PSO regarding the adequacy to meet mission and safety initiatives. If the proposed budget is insufficient, propose an alternate plan to PSO that can be accomplished within budget and/or identify needed additional funds.	DOE O 130.1		MGR/DEP – A, I	Business Each Office	L, P, I, M S, C, I, M	DOE/WIPP 04-3300, CBFO-95-1122
I.5. Technical Qualification and Competency Each DOE element is responsible for ensuring that its employees are qualified to perform their assigned functions. The Director of the Office of Management and Administration (MA-1) is responsible for managing the DOE program to develop and maintain personnel qualification standards and training materials for use by DOE employees to improve and maintain their competence. Use of those standards in a training and qualification program for Departmental technical personnel is an integral part of safety management.	DOE P 426.1, <i>Federal Technical Capability Policy for Defense Nuclear Facilities</i> , DOE M 426.1-1A, <i>Federal Technical Capability Manual</i> , DOE G 426.1-1, <i>Recruiting, Hiring, and Retaining High-Quality Technical Staff</i>		MGR/DEP – A ABSTA – L, M	Business Each Office	P, S, C I	DOE/CBFO-02-3219, <i>CBFO Technical Qualification Program Guide</i>
I.5.1. Technical Qualifications at Nuclear Facilities Provide adequate resources and support for the Federal Technical Capability Program Implement the Federal Technical Capability Program for CBFO.	DOE P 426.1, DOE M 426.1-1A, DOE G 426.1-1		MGR/DEP – A ABSTA – L, M	Business Each Office	S, C P, I	DOE/CBFO-02-3219

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Ensure that personnel are qualified to perform their safety management functions and that these qualifications are reflected in position descriptions and performance criteria.						
I.6. Contractor Training Programs Identify and submit resource requests to the CSO to provide for adequate implementation of personnel qualifications programs. Perform periodic systematic evaluations of training and qualification programs using DOE STD-1070-94 and provide day-to-day oversight of nuclear facility personnel training and qualification activities. Review and approve contractor Training Implementation Matrix. Assure that field office staffing includes an adequate number of persons having expertise in the area of personnel training. Assure that DOE contractors to whom DOE 5480.20A is applicable, implement its requirements.	DOE O 5480.20A, <i>Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities</i>		MGR/DEP – A MGR/DEP – A MGR/DEP – A MGR/DEP – A MGR/DEP – L	Business Operations Operations Business Operations Business Business Each Office Each Office	L, P, I S, C, M L S L, P, M S L S S, M	DOE/CBFO-04-3299, <i>CBFO Contractor Oversight Plan</i> , DOE/WIPP 04-3300
II. Define Scope of Work						
II.1. Translate Mission into Work Each field element is expected to develop appropriate documents delineating its plan of work, including scope, schedule, and funding allocations for each fiscal year. These plans may be documented in various formats, but at a minimum, should reflect	DOE O 130.1, DOE O 412.1, <i>Work Authorization System</i> , DOE P 413.1, <i>Program and Project Management Policy</i>		MGR/DEP – A	Business Each Office	L, I, M S, C, M	DOE/CBFO-03-3293, DOE/WIPP-04-3300, DOE/CBFO 03-3293, CBFO-95-1122

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the CSO mission in terms of work by facilities, projects, and programs.	DOE O 413.1A, <i>Management Control Program</i>					
<p>II.2. Set Expectations</p> <p>II.2.1. Policies, Orders, Manuals, Notices, Guides, and Page Changes</p> <p>Identify the directives or portions of directives applicable to CBFO and incorporate these requirements into the management system as appropriate in primary areas of responsibility. For other activities and facilities, where this authority is delegated (except for the authority in DOE O 420.1A, 5d), approve exemptions to directives except where otherwise stated in the directive for which the exemption is desired.</p> <p>Review and comment on proposed policies, orders, notices, manuals, guides, and page changes.</p> <p>Recommend technical and economical improvements, where appropriate.</p> <p>Provide staff to participate on focus groups or technical development teams.</p> <p>Provide comments to the Office of Primary Interest if directives are inconsistent with field element missions.</p> <p>Determine what actions by the Field Element are necessary to implement the directives.</p>	DOE P 251.1, <i>Directives System Policy</i> , DOE O 251.1A, <i>Directives System</i> , DOE M 251.1-1A, <i>Directives System A Manual</i>		MGR/DEP – A	Each Office (in area of resp.)	L, P, C, I, M	DE-AC04-01A166444, WIPP M&O Contract, WIPP S/RID (<i>Standards/Requirements Identification Document</i>)

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		Delegated CSO Authorities	Office of the CBFO Manager	CBFO Offices*		
The Contracting Officer (CO) negotiates with each contractor, in consultation with FEM, Lead Program Secretarial Officer (LPSO), and PSO, to establish which directives or provisions of directives, if any, are to be included in the contract.						
<p>II.2.2. Technical Standards for Use within DOE</p> <p>Review and comment on proposed DOE technical standards.</p> <p>Recommend technical and cost-saving improvements, where appropriate.</p> <p>Provide staff to participate on focus groups or technical development teams.</p> <p>Implement technical standards at WIPP as applicable.</p>	DOE O 252.1, <i>Technical Standards Program</i> , DOE G 252.1-1, <i>Technical Standards Program Guide</i>		MGR/DEP – A	Each Office	L/S (based on resp.), I, M	<p>Direct implementation of DOE O 252.1 and DOE G 252.1-1</p> <p>DE-AC04-01A166444, WIPP S/RID</p>
<p>II.2.3. Rules</p> <p>Review and comment on proposed rules.</p> <p>Recommend technical and cost-saving improvements, where appropriate.</p> <p>Provide staff to participate on focus groups or technical development teams.</p> <p>Implement the final rules as applicable.</p>	DOE P 251.1, DOE O 251.1A, DOE M 251.1-1A		MGR/DEP – A	Each Office	L/S (based on resp.), I, M	<p>Direct implementation of DOE P 251.1, DOE O 251.1A, and DOE M 251.1-1A</p> <p>DE-AC04-01A166444, WIPP S/RID</p>
<p>II.2.4. Contract Performance Expectations</p> <p>Prepare contracts that establish clear expectations and performance measures.</p>	FAR, DEAR, DOE O 226.1, <i>Contractor Oversight</i>		MGR/DEP – A, M	Business Each Office	L, P, I, M S, C, M	<p>DE-AC04-01A166444, <i>Performance-Based Incentives</i>, DOE/CBFO-04-3299, DOE/CBFO 03-3293</p>

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<p>Monitor contractor performance and assess whether performance expectations have been met.</p> <p>Approve annual submittal of performance measures, indicators, and objectives, as required by the integrated safety management DOE Acquisition Regulations (DEAR) clause in the M&O contract.</p> <p>The CO approve and issue contracts that meet contract regulations and provides clear expectations and performance measures to contractors regarding work to be performed and the mission and safety requirements.</p> <p>CO ensures contracts clearly delineate contractor responsibilities regarding subcontractors and suppliers.</p> <p>CO implements funding allocations consistent with the program office's allocations of resources, and revise allocations as delegated.</p> <p>CO acts as a liaison between the contractor and DOE staff regarding contract issues and performance expectations.</p> <p>CO ensures that Federal Acquisition Regulations (FAR) and DEAR Clauses (40 [Code of Federal Regulations] CFR 970.5204-2 and 48 CFR 5223-1) are included in the M&O contract.</p>					

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<p>II.2.5. Organization FRAM Documents</p> <p>Prepare, approve, and implement functions, responsibilities, and authorities (FRA) manuals for each organization to delineate how the applicable responsibilities and authorities in this Manual are performed. Revise FRA documents within 90 days of the issuance or revision of the DOE Safety Management FRAM, and following organizational changes.</p> <p>Ensure that the responsibility, authority, and accountability for operation and maintenance of all DOE facilities are clearly defined, appropriately assigned, and executed.</p>	DOE P 411.1, DOE M 411.1-1C, DOE/EM FRA Document		MGR/DEP – A, I ABSTA – L, P, I, M	Each Office	S, C, I, M	DOE/WIPP-98-2287, <i>CBFO Safety Management Functions, Responsibilities, and Authorities Manual</i> , DOE/CBFO-03-3293, DOE/WIPP-04-3300
<p>II.2.6. Approval, Implementation, and Maintenance of Safety Management System Documentation</p> <p>Ensure that M&O contractor develop, describe, and implement an effective ISMS.</p> <p>Ensure effective integration of Environmental Management System (EMS) and QA into the ISMS.</p> <p>Conduct line oversight to ensure effective implementation and maintenance of ISMS.</p> <p>Approve the WIPP Integrated Safety Management System Description and revisions thereto per 48 CFR 970.5223-1(e).</p>	DOE P 450.4, <i>Safety Management System Policy</i> , DOE G 450.4-1B, <i>Integrated Safety Management System Guide</i> DOE O 226.1, <i>Contractor Oversight</i>		MGR/DEP – A ABSTA – S	Each Office	L, I, M	DOE/CBFO-98-2276, <i>WIPP Integrated Safety Management System Description, CBFO Annual ISMS Review Plan, WIPP Annual ISMS Improvement Plan</i> DOE/CBFO-04-3299
			ABSTA – L	Operations QAM	I, M I, M	
			MGR/DEP – M	Each Office	L, I, M	
			MGR/DEP – A ABSTA – C, M	Operations	L, P	

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Review and determine annually whether contractor safety management systems and systems requirements (i.e., safety management system descriptions, lists of applicable directives, and authorization agreements) are current, valid, and appropriately reflected in the implementation procedures.			MGR/DEP – A ABSTA – L	Each Office	S, P, I, M	
II.7. Allocate Resources to Contractors Prepare budget execution documents in accordance with DOE O 135.1, <i>Budget Execution -- Funds Distribution and Control</i> , and DOE M 135.1-1, <i>Budget Execution Manual</i> , to allocate resources to contractors. Ensure funds and resources are appropriately used.	DOE O 135.1, DOE M 135.1-1		MGR/DEP – A	Business Each Office	L, P, M S, C, M	DOE/WIPP 04-3300, CBFO-95-1122
II.8. Establish Priorities Ensure that the safety management system adequately prioritizes work to ensure that, when implemented, mission and safety expectations for the site are met within available budget and resources. Review and support development of expected performance objectives and related PSO goals and priorities.	DOE P 450.4, DOE G 450.4-1B		MGR/DEP – A	Operations Each Office	L, M S, C, M	WIPP ISMS Description, DOE/CBFO 03-3293 DOE/WIPP 04-3300, DOE/CBFO-04-3299
III. Analyze Hazards						
III.1. Identify and Analyze Hazards Ensure the hazard analysis for nuclear facilities is properly performed to meet the requirements of 10 CFR Part 830, Subpart B.	10 CFR 830, DOE-STD-1027-92, <i>Hazard Charac. and Accident Analysis Techniques</i> , DOE-STD-3009-94, <i>Preparation Guide</i>		MGR/DEP – A ABSTA – L	Operations	P, I, M	WCAP 14312, <i>WIPP HAZOP</i> , WP 12.NS-04, <i>WIPP Nuclear Criticality Safety Program</i> , DOE/WIPP-02-3217, <i>WIPP Fire Hazards Analysis Report</i>

Table 1. Matrix of CBFO Safety Management Functions, Responsibilities, and Authorities

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		Delegated CSO Authorities	Office of the CBFO Manager	CBFO Offices*		
<p>Ensure that hazards analysis provided by the contractor properly covers the hazards associated with the work, is consistent with its safety management system, and provides sufficient information for the selection of safety standards and controls.</p> <p>Prepare and provide information for the designated Approval Authority to review and approve the methodology use to prepare the Documented Safety Analysis (DSA) for nuclear facilities, including the criteria for classifying nuclear safety structures, systems, and components, and document the basis of approval whenever the contractor does not use a methodology from Table 2 of Appendix A to Subpart B of 10 CFR 830. Transmit the alternative methodologies to the CSO and HSS for review and concurrence.</p> <p>Oversee the hazards surveys and hazards assessments for emergency planning purposes are adequately performed and documented in accordance with the requirements of DOE O 151.1B, <i>Comprehensive Emergency Management System</i>. Approve and forward approved hazards surveys and hazards assessments to the LPSO, CSO, PSO, and Director of Emergency Operations, as appropriate.</p>	<p><i>for DSA,</i> ANSI/ANS-8.x series standards on criticality</p>					
	DOE O 151.1B, DOE G 151.1-1 V1 to V7 DOE O 226.1		MGR/DEP – A ABSTA – S, M	Operations	L, P, I	WP 12-RP.01, <i>WIPP Emergency Planning Hazard Survey</i> DOE/CBFO-04-3299

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<p>III.2. Categorize Facility/Activity Based on the Hazards</p> <p>Concur on facility/activity classification level based on (i) input from DOE line managers or contractors regarding the type and amounts of hazards and (ii) the requirements of 10 CFR 830.202(b)(3).</p>	DOE-STD-1027-92		MGR/DEP – C ABSTA – S, M	Operations	L, P, I	WCAP 14312, WIPP HAZOP, DOE/WIPP-95-2065, WIPP CH TRU Waste DSA, DOE/WIPP-03-3147, WIPP RH TRU Waste DSA DOE/WIPP-95-2125, Waste Isolation Pilot Plant Contact Handled (CH) Technical Safety Requirements, DOE/WIPP-06-3178, Waste Isolation Pilot Plant Remote-Handled (RH) Waste Technical Safety Requirements
<p>III.3. Evaluate Environmental Impacts</p> <p>Approve the contract environment, safety, and health (ES&H) requirements. (EM delegated authority)</p> <p>Develop and implement a [National Environmental Policy Act] NEPA Compliance program and use the NEPA process in program and project planning to take into account environmental factors.</p> <p>Maintain a DOE NEPA Compliance Officer (NCO) for the office.</p>	DOE P 450.7, <i>Environment, Safety and Health Goals</i> , DOE O 450.1, <i>Environmental Protection Program</i> , DOE G 450.1-10, <i>Senior Managers' Guide for Use with DOE O 450.1</i> , DOE O 451.1B, <i>NEPA Compliance Program</i> , DOE P 450.2A, <i>Identifying, Implementing, and ES&H Requirements</i>	Approve applicable execution documents for submission to the U. S. Environmental Protection Agency (EPA) and State on behalf of DOE	MGR/DEP – A, M	Operations	L, P, I	DOE/EIS-0026-S-2, WIPP Disposal Phase Final Supplemental Environmental Impact Statement (SEIS-II), WP 02-EC.0, WIPP Environmental Management System Description
IV. Develop and Implement Controls						
<p>IV.1. Identify Applicable Standards and Requirements</p> <p>Identify standards and requirements for implementation at WIPP.</p> <p>Ensure effective implementation of DOE O 420.1A, <i>Facility Safety</i> (EM delegated authority).</p>	DOE P 251.1, DOE O 251.1A, DOE M 251.1-1A, DOE O 420.1A, <i>Facility Safety</i> , DOE G 420.1-1, <i>Nonreactor Nuclear Safety Design Criteria...</i>	Review and approve contractor implementation of DOE O 420.1A, and ensure all WIPP programs comply with this order.	MGR/DEP – A ABSTA – S, M	Each Office	L, P, I	WIPP S/RID

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	DOE G 421.1-2, <i>Guide for the Mitigation of Natural Phenomena Hazards...</i>					
IV.1.1. Exemption from DOE Directives. Prepare and request exemptions from requirements of DOE Directives (except Rules) as needed.	DOE O 251.1A		MGR/DEP – C ABSTA - S	Each Office	L, P, I, M	WIPP S/RID
IV.1.2. Exemption from Nuclear Safety Management and Radiation Protection Rules Review and provide recommendations to EM and HSS on requests for exemptions from 10 CFR 830 and 10 CFR 835 requirements (See 10 CFR 820, Subpart E and DOE-STD-1083-95).	10 CFR 830, 10 CFR 835		MGR/DEP – C ABSTA – S	Site Operations	L, P, I, M	WIPP S/RID
IV.1.3. Exemption from External Requirements As necessary, prepare and request exemption from external (local, state, NRC [Nuclear Regulatory Commission], DOT [Department of Transportation], EPA) requirements.	Applicable external requirements		MGR/DEP – C ABSTA – S	Each Office	L, P, I, M	WIPP S/RID
IV.1.4. New or Modification of Cleanup Agreements Recommend negotiation strategy to the EM Principal Deputy Assistant Secretary (EM-2) for cleanup agreements (EM delegated authority).	DOE M 411.1-1C, DOE/EM FRA Document	Develop and submit negotiation strategy to EM-2 for new cleanup agreements or significant modifications to existing agreements.	MGR/DEP – C	Each Office	S, P, I, M	DOE/WIPP 98-2287

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<p>IV.1.5 Approval of Radiation Protection Program</p> <p>Direct M&O contractor to prepare RPP to implement 10 CFR 835. Review and approve the WIPP RPP (EM delegated authority).</p>	10 CFR 835	Review and either direct changes to or approve RPP and associated implementation plans for 10 CFR 835 within 180 days after submittal to DOE.	MGR/DEP – A ABSTA – L	Site Operations	P, I, M	WIPP Radiation Protection Program, DOE/WIPP-95-2054
<p>IV.1.6. Preparation of Programs and Processes Required by Nuclear Safety Rules</p> <p>Direct the contractor to prepare a USQ [unreviewed safety question] procedure and DSAs (including Technical Safety Requirements) in accordance with 10 CFR 830.</p> <p>Review the USQ procedure and DSAs for compliance with the requirements of 10 CFR Parts 830.</p> <p>Approve the USQ procedure. Approve changes and continued operations involving a USQ (EM delegated authority).</p> <p>Prepare DSAs using provisions of Table 2 of Appendix A to Subpart B of 10 CFR 830. Prepare Safety Evaluation Reports per Appendix A I.1 to Subpart B of 10 CFR 830. Submit DSAs and SERs, and provide recommendations for approval to the EM Approval Authority (EM-24) (EM delegated authority).</p>	10 CFR 830	Approve changes determined to involve a USQ prior to implementation, and approve continued operations when a USQ is determined to exist. Ensure updated DSAs are submitted annually. Prepare an SER for each DSA submitted.	MGR/DEP – A/C depending on authority ABSTA – L, M	Operations	P, I	DOE/WIPP-95-2065 DOE/WIPP-03-3147, WP 02-AR3001, <i>USQ Determination</i>

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<p>IV.2. Identify Controls to Prevent and Mitigate Hazards</p> <p>Identified controls must appropriately address hazards to the worker, the public, and the environment from either nuclear or non-nuclear materials and operations. This effort includes both DOE and external controls (e.g., permits).</p>	10 CFR 830		MGR/DEP – A ABSTA – C, M	Operations	L, P, I, M	<p>Review and either direct changes to or approve RPP and associated implementation plans within 180 days after submittal to DOE.</p> <p>DOE/WIPP-95-2125, <i>Waste Isolation Pilot Plant Contact Handled (CH) Technical Safety Requirements</i>, DOE/WIPP-06-3178, <i>Waste Isolation Pilot Plant Remote-Handled (RH) Waste Technical Safety Requirements</i></p>
<p>IV.3. Authorization Protocols</p> <p>Determine appropriate protocol based on work and hazard.</p> <p>Prepare and submit an Authorization Agreement to the EM Approval Authority (EM-24) for review and approval.</p> <p>Establish requirements to ensure that the WIPP Authorization Agreement is maintained up-to-date</p>	DOE O 412.1A, <i>Work Authorization System</i>		MGR/DEP – C ABSTA – S	Operations	L, P, I, M	WIPP Authorization Agreement
<p>IV.4. Implement Controls</p> <p>Monitor the proper implementation of controls, including contractor processes for USQs and configuration management and compliance with Technical Safety Requirements.</p>	10 CFR 830,		MGR/DEP – M ABSTA – S, M	Operations	L, P, I, M	DOE/WIPP-95-2065, WP 02-AR3001 DOE/CBFO-04-3299
V. Perform Work						
Each field element organization is responsible for implementing a Federal Employee Occupational Safety and Health (FEOSH) program for its DOE employees.	29 CFR 1960, <i>Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters</i>		MGR/DEP – A	Each Office	L, P, I, M	DOE/CBFO-94-1051, <i>CBFO FEOSH Program</i>

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V.1. Confirm Readiness Suspend or stop work if a clear and present safety or environmental danger exists and promptly notify the CBFO Manager's Office PSO and HSS.	DOE O 440.1A, <i>Worker Protection Management for DOE and Contractor Employees</i>		MGR/DEP – I	All CBFO Staff	I	General Employee Training (GET)
V.1.1. Operational Readiness Reviews and Readiness Assessments Ensure that Operational Readiness Reviews (ORRs) and Readiness Assessments (RAs) are conducted by a competent review team in accordance with DOE O 425.1C, <i>Startup and Restart of Nuclear Facilities</i> . Support the EM Start-Up/Restart Approval Authority (EM-24) in the determination of facility readiness.	DOE O 425.1C		MGR/DEP – C ABSTA – S, M	Operations	L, P, I, M	Direct implementation of DOE O 425.1C
V.1.2. Startup Notification Reports Require that contractors prepare Startup Notification Reports. Review and submit each Startup Notification Report to the Approval Authority (EM-24).	DOE O 425.1C		MGR/DEP – C ABSTA – S, M	Operations	L, P, I, M	WIPP Startup Notification Reports (Quarterly)
V.2. Perform Work Safely Direct and approve Worker Protection Programs (EM delegated authority). Monitor proper implementation of the safety management system. Perform line management oversight of contractor's worker, public, environment, and facility protection programs.	DOE P 450.4, 29 CFR 1960, DOE O 440.1A, DOE M 426.1-1A, DOE O 226.1	Serve as authority for Worker Protection Program Functions.	MGR/DEP – L, I, M ABSTA – S, M	Each Office	L, I, M	DOE/CBFO-04-3299, DOE/CBFO-02-3219

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Maintain day-to-day operational oversight of contractor activities at applicable facilities through DOE Facility Representatives.						
<p>V.3. Environmental Compliance</p> <p>Implement DOE directives and regulations related to environmental protection.</p> <p>Implement [Resource Conservation and Recovery Act] RCRA requirements and approve related documents (EM delegated authority).</p> <p>Implement 40 CFR 191, <i>Environmental Radiation Protection Standards for Management and Disposal of Spent Nuclear Fuel, High-Level, and TRU Radioactive Wastes</i>.</p> <p>Implement 40 CFR 194, <i>Criteria for the Certification and Re-certification of the Waste Isolation Pilot Plant's Compliance with 40 CFR Part 191 Disposal Regulations</i>.</p>	DOE O 450.1, 40 CFR 264, <i>Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities</i> , 40 CFR 191, 40 CFR 194	Approve RCRA closure/post-closure plans, corrective action permits/orders, and RCRA operating permits.	MGR/DEP – A ABSTA - S	Operations	L,P,I,M	WIPP EMS Description (DOE/WIPP 05-3318), RCRA Permit (HWFP # NM4890139088), EPA Compliance Certification, DOE/WIPP 01-3199, <i>WIPP Recertification Project Plan</i> , DOE/WIPP 99-2194, <i>WIPP Environmental Monitoring Plan</i>
<p>V.4. Quality Assurance</p> <p>Direct contractor to prepare quality assurance programs (QAPs) to meet the requirements of 10 CFR 830 and DOE O 414.1C, <i>Quality Assurance</i>. Review and approve contractors' QAPs (EM delegated authority).</p> <p>Ensure that contractors implement QAPs.</p> <p>Ensure integration of QAPs into ISMS.</p> <p>Complete SQA activities required by the</p>	DOE O 414.1C, 10 CFR 830 DOE O 226.1	Review and approve contractor QAPs. This includes requirements under DOE O 414.1C. Review and approve annual updates. As directed by DOE/EM, this authority is further delegated to the	MGR/DEP – A ABSTA – S, M	QAM Each Office	L, P, I, M S, C, I, M	DOE/CBFO-94-1012, <i>Quality Assurance Program Document (QAPD)</i> DOE/CBFO-04-3299

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<p>Review ORPS reports from all sites to detect potential improvements and means of averting occurrences.</p> <p>If approval authority for off-normal and unusual occurrence reports has been delegated to the FEM, it may be further delegated to the level considered appropriate by the FEM.</p>	<i>Analysis Guide</i>	Authority for approval of Category R and 2 Final Occurrence Reports may be assigned to a qualified Facility Representative.				
<p>VI.1.3. ES&H Reporting Requirements</p> <p>Implement ES&H reporting at the site to meet the requirements of DOE O 231.1A, <i>Environment, Safety, and Health Reporting</i>.</p>	DOE O 231.1A		MGR/DEP – A ABSTA – S	Operations	L, P, I, M	Direct implementation of DOE O 231.1A, Injury/Illness Reports, Annual ES&H Reports
<p>VI.1.4. Assessments</p> <p>Assess CBFO to identify areas for continuous improvement in the safety management of WIPP operations. Assign responsibility within CBFO for establishing criteria for such assessments and for conducting them.</p> <p>Examine the findings of both internal and external assessments of CBFO to identify root causes, trends, and necessary corrective actions within the responsibility of CBFO. Ensure that appropriate priorities and resources are assigned to corrective actions.</p> <p>Direct and approve audits and surveillances under the general category of assessments.</p> <p>Ensure that all currently applicable safety requirements are captured in the CBFO</p>	DOE O 450.1, DOE O 414.1C, DOE M 411.1-1C, DOE O 226.1, DOE P 426.1, DOE M 426.1A, Section 1		MGR/DEP – A, I, M	Each Office	L, S, P, I, M based on primary resp.	MP 9.1, <i>Management Assessment</i>
			ABSTA – M	QA Each Office	A, L P, I	DOE/CBFO-94-1012, QAPD
			ABSTA – L, P	Each Office	S, I, M	DOE/WIPP 98-2287

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<p>FRAM and are consistent with other FRA documents of other organizations with which there are interfaces.</p> <p>Ensure institutionalization of Vital Safety System assessment, including Safety System Oversight requirements and the WIPP Cognizant (System) Engineer Program.</p> <p>Plan and conduct an assessment of the implementation of SQA requirements, following the guidelines of the DOE Implementation Plan for DNFSB Recommendation 2002-1 and associated Criteria Review and Approach Documents (CRADs).</p>			<p>ABSTA – M</p> <p>ABSTA – M</p>	<p>Operations</p> <p>Each Office</p>	<p>I, M, L P</p> <p>S, I, M, L P</p>	<p>DOE/CBFO 04-3299</p> <p>WP 08-NT.06, <i>CBFO SQA Assessment Plan</i></p>
<p>VI.1.5. Accident Investigations</p> <p>Accident investigations are performed as part of independent oversight function. The responsibilities and procedures for accident investigations are covered in detail in DOE O 225.1A <i>Accident Investigations</i>.</p>	<p>DOE O 225.1A, DOE G 225.1A-1, <i>Implementation Guide for Use with DOE O 225.1 Accident Investigations</i></p>		MGR/DEP – A	Operations	L, P, I	Direct implementation of DOE O 225.1A
<p>VI.2. Make Changes to Improve</p> <p>Continuously improve the efficiency and quality of operations; develop, implement, and track corrective actions to profit from prior experience and the lessons learned.</p> <p>Develop and maintain a process to ensure that corrective actions are planned and pursued to completion and adequately correct the root causes of the conditions that prompted them.</p>	<p>DOE M 411.1-1C, DOE/EM FRA Document, DOE P 450.4</p>		MGR/DEP – A, M	Each Office	L, P, I, M	DOE/CBFO 98-2276, <i>WIPP ISMS Improvement Plan</i>

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Develop and maintain a process to ensure that information from various feedback sources are evaluated in an integrated manner and corrective actions are prioritized based upon importance.						
<p>VI.3. Oversight and Enforcement</p> <p>VI.3.1. Line Management Oversight</p> <p>Perform management assessment of contractors to evaluate their success in doing work safely.</p> <p>Appraise performance of the contractor against formally established ES&H and emergency management performance measures and other ES&H and emergency management performance indicators, and take appropriate action.</p>	DOE O 226.1		MGR/DEP – A, M	Each Office	L, P, I, M	DOE/CBFO 04-3299
<p>VI.3.2. HSS Independent ES&H Oversight</p> <p>Ensure that duly authorized independent oversight personnel have unfettered access to information and facilities, consistent with safety and security requirements.</p> <p>Assign a cognizant line manager and prepare a [corrective action plan] CAP to address the issues raised in formal independent oversight assessment reports. If the Office of Independent ES&H Oversight provides comments on a CAP, determine whether the CAP needs to be revised to address those comments, and revise the CAP appropriately.</p> <p>Implement the CAP.</p>	DOE O 226.1		MGR/DEP – A, M	Each Office	L, P, I, M	Direct implementation of DOE O 226.1

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Coordinate with the field and Headquarters DOE elements to ensure that all closed corrective actions have been verified by persons with sufficient independence from those who performed the work described in the CAP.						
<p>VI.3.3. Office of Independent Oversight and Performance Assessment (OA)</p> <p>Ensure that duly authorized independent oversight personnel have unfettered access to information and facilities, consistent with safety and security requirements.</p> <p>Assign a cognizant line manager to prepare a CAP to address the issues raised in formal independent oversight assessment reports.</p> <p>Approve CAPs within 30 calendar days of the issuance of the formal independent oversight assessment report.</p> <p>If the OA assessment provides comments on a CAP, determine whether the CAP needs to be revised to address those comments, and revise the CAP appropriately.</p> <p>Implement the CAP.</p> <p>Coordinate with the field and Headquarters DOE elements to ensure that all closed corrective actions have been verified by persons with sufficient independence from those who performed the work described in the CAP.</p>	DOE O 226.1		MGR/DEP – A, M	Each Office	L, P, I, M	Direct implementation of DOE O 226.1

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<p>VI.3.4. Price-Anderson Amendments Act (PAAA) Enforcement</p> <p>Monitor contractor reporting of potential nuclear safety violations and noncompliances with nuclear safety rules to the Office of Enforcement and Investigation (OEI) for review under the provisions of 10 CFR 820, Federal Rules for DOE Nuclear Activities.</p> <p>Provide information and support investigations. Ensure the unfettered access of the OEI personnel to information and facilities, consistent with safety and security requirements. Participate in enforcement conferences with the OEI.</p>	PAAA, 10 CFR 820		MGR/DEP – C, M	Each Office	L, P, M	Direct implementation of PAAA
<p>VI.3.5. Interface with DNFSB Independent Oversight</p> <p>Provide full cooperation with the Board, including ready access to CBFO facilities, personnel, and information; provide responses to DNFSB recommendations and requests as described in DOE M 140.1-1B, <i>Interface with the Defense Nuclear Facilities Safety Board</i>.</p>	DOE M 140.1-1B		MGR/DEP – A, M, L	Each Office	S, C, M	Direct implementation of DOE M 140.1-1