
Environmental Management System

CHAPTER

2

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Regulatory Integration & Environmental Services

Compliance with environmental statutory and other legal regulatory requirements is a fundamental responsibility of all federal agencies. In 2009, SRS continued to meet or exceed performance expectations with respect to the management of environmental protection media (air, water, waste programs, etc.).

This chapter focuses on the integration of numerous environmental requirements mandated by existing statutes, regulations, and policies as implemented through the Environmental Management System (EMS). All contractor requirements mandated by U.S. Department of Energy (DOE) Order 450.1A, “Environmental Protection Program,” are appropriately considered in the site’s Integrated Safety Management System (ISMS) structure.

A management system is a tool established by an organization to manage its operations and activities in the pursuit of its policies and goals. In the case of the EMS, it is not a stand-alone environmental program or a data management program. When properly implemented, this management system enables SRS to clearly identify and establish environmental goals, develop and implement plans to meet the goals, determine measurable progress toward the goals, and take steps to ensure continuous improvement.

Executive Order (EO) 13423, “Strengthening Federal Environmental, Energy, and Transportation Management,” was signed by President Bush January 24, 2007. This order directs each federal agency to use an EMS as the management framework to implement, manage, measure, and continually improve upon sustainable environmental, energy, and transportation practices. EO 13423 mandates that the EMS shall include corresponding federal agency-specific objectives and targets to meet goals in the areas listed below.

- Energy Efficiency and Reduction of Greenhouse Gas Emissions

- Use of Renewable Energy
- Water Conservation
- Fleet Management
- Construction and Renovation of High-Performance Buildings
- Electronics Stewardship and Purchasing
- Reduction in the Use of Toxic and Hazardous Chemicals and Materials
- Acquisition of Environmentally Preferable Goods
- Pollution and Waste Prevention and Recycling

For DOE, the promulgation of EO 13423 resulted in the revision of DOE Order 450.1A, which was released June 4, 2008. The revision mandated a formal “declaration of conformance” to the EMS requirements no later than June 30, 2009. Savannah River Nuclear Solution (SRNS) personnel initiated activities—including the establishment of supporting environmental, energy, and transportation management objectives and targets—that resulted in the “declaration” requirement being satisfied June 12, 2009.

EO 13514 (“Federal Leadership in Environmental, Energy, and Economic Performance”) was signed in October 2009. Although it has not yet resulted in revisions of any DOE order(s), it is being evaluated for potential enhancements to the EMS.

SRS EMS Implementation

DOE Order 450.1A requires an organization to develop an environmental policy, create plans to implement the policy, implement the plans, check progress and take corrective actions, and review the system annually to ensure its adequacy and effectiveness. An annual revision of the SRS Environmental Policy Letter was published to more clearly integrate requirements from DOE Orders 450.1A and 430.2B, “Departmental Energy, Renewable Energy, and Transportation Management.” Sitewide endorsement of the policy was reflected by the signatures of senior management from DOE, the primary contractors, and tenant organizations. DOE Order 450.1A includes a requirement that in the initial year of implementation (2009) and every third year thereafter, an independent external audit must be performed to ensure compliance with the Order and conformance with the 17 elements of the International Organization for Standardization (ISO) 14001 Standard, “Environmental Management System.” The external audit of SRS’s EMS—conducted April 28 to May 1, 2009—concluded that the EMS conformed with both the order and the ISO standard. This conclusion became the basis for the “declaration of conformance” mentioned earlier.

Significant SRS contributions initiated and/or completed within the EMS during 2009 include the following:

- In accordance with the requirements of DOE Order 450.1A, an audit of the EMS was conducted by a qualified outside party. The audit culminated in a “declaration of conformance” June 23. Along with five noteworthy practices identified, a formal corrective action plan was developed to address one minor nonconformance, three opportunities for improvement, and two observations. All corrective actions were entered into the site commitment tracking system. One action remains open and is scheduled for completion by March 2010.
- A self-assessment was conducted on the EMS program—using lines of inquiry derived from DOE Order 450.1A and ISO Standard 14001 (among others)—to validate issues/concerns indicated by the external audit. In reinforcing the audit findings, the self-assessment identified the need for increasing senior management engagement with the EMS process. As such, procedural revisions were implemented to more clearly define process and expectations with respect to roles, responsibilities, and activities associated with management reviews.

- Revised both the EMS implementing procedure and description manual to include (1) the establishment of site-specific targets to achieve sustainable environmental stewardship, energy, and transportation goals, (2) the incorporation of EMS elements into the Integrated Safety Management System (ISMS), (3) addressing assessments/audits and the identification of root causes of noncompliance, and (4) a formal third-party audit that culminated in a “declaration of conformance.”
- Established an intranet website as a repository for pertinent program documents, including the formal declaration of conformance, communications with internal customers and external agencies, and applicable procedures, as well as records of briefings and audits/assessments.
- Initiated a progressive review process using various SRS environmental management programs, including the Senior Environmental Management Council (SEMC – a body of senior environmental managers representing all site primary contractor and tenant organizations).

The chapter sections that follow describe the 17 elements that demonstrate SRS implementation of DOE Order 450.1A, which requires the EMS to reflect the elements and framework in the ISO 14001 Standard.

Environmental Policy

The SRS Environmental Policy is a statement of the site’s intention to implement sound stewardship practices that are protective of the air, water, land, and other natural cultural resources impacted by SRS operations. The objective of this policy is to establish a consistent site-wide approach to environmental protection through the implementation of an EMS as integrated within the site’s comprehensive ISMS. The SRS EMS provides for the systematic planning, integrated execution, and evaluation of site activities for (1) public health and environmental protection, (2) pollution prevention (P2) and waste minimization, (3) compliance with applicable environmental protection requirements, and (4) continuous improvement of the EMS.

The SRS Environmental Policy document in effect through FY 2010 is included on the CD accompanying this report. The policy is updated, published, and communicated throughout the site annually. Additionally, it is posted routinely to the externally accessible SRS

website to foster additional communication with, and awareness by, the surrounding community.

Environmental Aspects and Impacts

Determining environmental aspects (elements of activities, products, processes, and services that could have a significant impact on the environment) is critical to the EMS process. It equates to analyzing hazards via the ISMS review protocol. Identifying the SRS environmental aspects is not the end of the process. Work activities, whether routine or unusual, must consider whether these aspects are a potential part of the work activity. This leads to the development and implementation of controls necessary to mitigate the potential that the action will adversely affect the environment. Environmental aspects (as well as goals and targets) are reviewed during EMS status meetings with the SEMC and senior management to keep the aspects current. SRS has determined that the following aspects of its operations have the potential to affect the environment:

- Air pollutants
- Asset management (including procurement of environmentally preferable goods and chemical and electronics management)
- Biological hazards
- Building performance and sustainable design
- Cultural/historical resource disturbance
- Ecological research
- Energy conservation (including energy efficiency, renewable energy, and alternative fuels)
- Environmental remediation development, demonstration, and deployment
- Nanomaterials
- Pollution prevention/waste minimization
- Solid waste management (including hazardous, nonhazardous, sanitary, nonradiological, radiological, and mixed)
- Storage of hazardous, mixed, or radioactive

materials or wastes in tanks (underground and above ground)

- Transportation (fleet) management
- Water pollution and conservation
- Wildlife and habitat management

Legal and Other Requirements

Regulatory and DOE requirements for environmental programs are included in the site's Standards/Requirements Identification Document(S/ RID), Functional Area (FA) 20 – Environmental Protection. The purpose of FA 20 is to address environmental, safety, and health technical and programmatic requirements related to environmental protection activities undertaken by contractors on behalf of DOE at SRS. Sources include DOE Order 5400.5 ("Radiation Protection of the Public and Environment"), DOE Order 450.1A, DOE Order 451.1B ("National Environmental Policy Act Compliance Program"), applicable Codes of Federal Regulations, and State of South Carolina pertinent directives. The environmental protection S/RID functional area includes activities required to protect the environment and the health of the public and workers. The scope of the S/RID addresses ten major elements:

- Environmental protection
- Environmental policy management
- Permits
- Environmental monitoring, surveillance and inspections
- Environmental control standards
- Pollution prevention
- Record keeping, reports, and notifications
- Key Interfaces
- Major sources of environmental requirements and standards; and
- Documents and references.

Objectives, Targets, and Programs

The EMS pursues and measures continual improvement in performance by establishing and maintaining documented environmental objectives and targets that counterbalance SRS activities having actual or potentially significant environmental impacts. Objectives and targets are established to 1) achieve full compliance with applicable environmental requirements, 2) devote resources to specific pollution prevention initiatives, and 3) ensure responsible stewardship of natural and historical resources at SRS.

In accordance with the requirements of DOE Order 450.1A, environmental objectives and targets are established, implemented, and maintained consistent with and in support of the following DOE environmental objectives:

- Increase energy efficiency and reduce greenhouse gases (GHG)
- Increase use of renewable energy
- Increase water conservation
- Increase procurement of environmentally preferred products (EPP)
- Increase pollution prevention initiatives
- Incorporate sustainable building standards
- Increase petroleum conservation
- Practice affirmative life-cycle management of electronics
- Increase alternative fuel use
- Practice effective use of environmentally friendly options in the exercise of transportation (fleet) management

The enhancement goals and targets for each of these objectives are developed and endorsed by senior management responsible for each of the functional areas associated with the objectives. Once approved, responsibility for the achievement of the goals and targets resides with that organization. Respective

lead-points-of-contact (POCs) are designated and execution timelines are established and tracked. Annual targets and corresponding metrics reflective of progress are posted to the internal EMS website and are otherwise available upon request.

For FY09, seven specific objectives and targets encompassing nine environmental aspects were established. All objectives and targets were directly related to the “leadership goals” and “TEAM Initiatives” defined in DOE Order 430.2B (“Departmental Energy, Renewable Energy, and Transportation Management”). The targets for each objective defined in the order were met or exceeded through FY09 relative to the baseline year. A [table](#) on the CD housed inside the back cover of this report provides a summary of the objectives and targets, the actions taken, and the progress/success.

Additional references defining SRS goals and objectives include

SRS FY2010 Executable Plan for Energy Efficiency, Renewable Energy, and Transportation Management – Revision 0, dated December 2009, contains detailed information specifically related to requirements and objectives delineated in DOE Order 430.2B.

Pollution Prevention (P2) Program – The SRS P2 program is addressed by and documented in the site’s Environmental Compliance Manual (3Q), Procedure 6.11 (“Pollution Prevention Program”), with specific annual reduction goals agreed upon by the M&O contractor and DOE–SR.

Natural Resources Management Plan (NRMP) – The USFS–SR uses the NRMP to provide strategic guidance for SRS natural resource programs, and furthers the mission of SRS by helping to ensure responsible stewardship of the environmental resources at SRS.

WSI–SRS Annual Operational Plan (AOP) – The AOP identifies each task to be performed by Wackenhut Services, Inc. (WSI–SRS) with respect to major operations or programs defined by DOE–SR. Because of security requirements, the WSI–SRS AOP is not available publicly; however, information about it can be obtained by contacting the manager of SI’s Contracts and Resources Management Department at 803–952–7565.

Resources, Roles, and Responsibilities

All SRS employees have specific roles and responsibilities in key areas, including environmental protection. Environmental and waste management technical support personnel assist site line organizations with developing and meeting their environmental responsibilities. Additional detailed information relative to resources, roles, responsibilities, and authority as they relate to the SRS EMS is contained within Manual 3Q, Procedure 13.5, “EMS Implementation,” and Procedure 18.1, “Site Environmental Protection”; Policy Manual 1–01, MP 4.1, “Environmental Assurance”; and “EMS Description Manual” (G–TM–G–00001), as well as within facility-specific implementing and operations procedures.

Competence, Training, and Awareness

The purpose of SRS environmental training programs is to ensure that personnel whose actions could have environmental consequences are properly trained and made aware of their responsibilities to protect the environment, workers, and the public. EMS requirements have been provided to employees whose responsibilities include environmental protection and regulatory compliance. All employees are responsible for supporting and complying with EMS programs and processes. This includes compliance with legal requirements, an understanding of pollution prevention/waste minimization techniques, and the need to continuously improve operating practices to enhance and protect the site’s workers and environment—and the public. This line management responsibility is accomplished primarily through the activities of environmental compliance groups assigned to each organization.

SRNS’s environmental training curriculum ensures that personnel are trained and aware of environmental responsibilities, including reporting instances of environmental noncompliance. The curriculum includes job-specific training to develop operational-level competencies and/or subject matter expertise; initial General Employee Training, including environmental responsibilities required of all employees, subcontractors, and vendors; and Consolidated Annual Training to provide annual refresher training on environmental responsibilities. Training program requirements are documented in Manual 4B, “Training and Qualification Program Manual”; in Manual 3Q, Procedure 13.5, and in “EMS Description Manual.”

Communication

SRS continues to improve internal and external communications on environmental issues. Many policies and procedures guide communications at SRS, ranging from the general site policy to forms and techniques addressed in facility-specific procedures. Additionally, SRS solicits input from interested parties such as community members, activists, elected officials, and regulators. The SRS Citizen’s Advisory Board provides advice and recommendations to DOE on environmental compliance, remediation, waste management, facility decommissioning, and related issues. Ex-officio members from DOE, the U.S. Environmental Protection Agency (EPA) Region 4, the South Carolina Department of Health and Environmental Control (SCDHEC), and the Georgia Department of Natural Resources participate in board activities. At the core of the communication and community involvement programs are the SRS EMS Policy and the SRS Federal Facility Agreement Community Involvement Plan. The ultimate goal of environmental communication is to improve the site’s overall environmental performance.

Additional forums for the dissemination of information associated with environment issues include the

- *Senior Environmental Managers Committee (SEMC)* – comprised of senior-level environmental managers from all of the SRS contractors. Information is shared via the SEMC on environmental concerns, regulatory matters, SRS operational issues, and upcoming changes to improve the SRS environmental compliance program.
- *Environmental Quality Management Division (EQMD)* – DOE’s Savannah River Operations Office (DOE–SR) conducts a periodic meeting of the SRS contractors along with the DOE environmental staff to discuss issues relevant to environmental protection and compliance. These discussions provide a forum for DOE to provide regulatory direction and expectations to the site contractors as well as receive updates on the status of environmental/regulatory issues.
- *SRS Regulatory Integration Team (SRIT)* – DOE–SR, EPA Region 4, and SCDHEC have formed the SRIT to effectively implement the regulatory integration process at SRS. The

SRIT identifies issues that are cross-cutting and require high-level agency agreement so that actions can be taken consistently across multiple programs. The SRIT commissions Integrated Project Teams (IPTs); designates a team lead; defines the overall scope, objective, and deliverables; and provides guidance to facilitate issue resolutions or to build upon opportunities.

- *Challenges, Opportunities, and Resolution (COR) Team* – The COR team consists of regulatory compliance representatives from each SRNS organization and major contractors that work on site. The COR team discusses emerging compliance or implementation challenges and opportunities, and develops and coordinates resolution of challenges via IPTs. EQMD personnel are briefed biweekly on COR activities.
- *Environmental Compliance Authorities* – ECAs are trained environmental professionals dedicated to specific projects and facilities at SRS. The ECAs assist projects in identifying potential environmental issues and solutions and provide regulatory updates and guidance to program personnel.
- *SRS Online Electronic Bulletin* – The SRS Online Electronic Bulletin is an electronic communications tool used by SRS management. The bulletin is used by RI&ES to provide (1) timely information to employees on environmental matters, such as how to report spills and other issues, and (2) the communication of responsibilities protection of the environment.
- *SRS Operating Experience Program* – The SRS Operating Experience Program implements a systematic review of the operating experiences (e.g., lessons learned) at SRS facilities, similar DOE complex facilities, and commercial nuclear industry facilities for the purpose of preventing events and eliminating recurring events.

Many site- and facility-specific policies and procedures guide and enable environmental communications at SRS. These range from general site policy declaration and dissemination to an intranet web-based newsletter to various group forums (prejob briefings, workplace meetings, monthly safety meetings, etc.) and formal and informal intervention and instructional techniques (Behavior Based Safety observations, on-the-job training, “management by walking around,” etc.). Additionally, an intranet

website is dedicated to facilitating the dissemination of EMS-related information. Posted to the site’s externally accessible website is the “EMS Description Manual,” which documents how the EMS is implemented across the site in accordance with DOE Order 450.1A.

Documentation

EMS documentation includes, but is not limited to

- the environmental policy
- objectives and targets
- description of the EMS scope
- description of the main elements of the EMS and their interaction and reference to related documents
- records determined by organizations to be necessary to ensure the effective planning, operation, and control of processes related to the organizations’ significant environmental aspects

Site and/or facility-specific implementing procedures and/or work packages define what documents are to be retained for historical purposes to meet programmatic and statutory requirements.

SRS source documents used by various organizations, contractors, and tenant activities to manage their EMS-associated documents include, but are not limited to, the following:

- SRS Environmental Policy
- Manual 3Q, “Environmental Compliance Manual”
- “SRS Environmental Management System Manual,” G-TM-G-0001
- SRM 300.1.1B, Chapter 1, Section 1.2, “DOE–SR Functions, Responsibilities, and Authorities Procedure”
- SREL Environmental Management Program Description
- “WSI–SR Environmental Management System Implementation Plan,” WSI 1–05

Operational Control

The EMS operational control element helps ensure that controls are in place to implement environmental policy-related activities of regulatory compliance, pollution prevention, and continuous improvement by SRS management. Consistent with its policy, objectives, and targets, operations and activities are identified, planned, and executed to ensure that they are carried out within appropriate controls, thereby eliminating or mitigating adverse impacts and enhancing beneficial impacts.

Rigorous work control practices include the following:

- establishing, implementing, and maintaining control of situations where their absence could lead to deviation from the environmental policy, objectives, and targets
- stipulating acceptable operating criteria
- ensuring that significant environmental aspects are considered in decisions related to goods and services, and are communicated to suppliers and subcontractors

Operational controls are implemented through multiple rigorous processes documented in the 2S Manual, “Conduct of Operations”; 1Y Manual, “Conduct of Maintenance”; 8Q Manual “Employee Safety Manual”; and 11B Manual, “Subcontractor Management Manual.” The Assisted Hazards Analysis and the Environmental Evaluation Checklist (EEC) are among the site processes that support implementation of the EMS.

Emergency Preparedness and Response

Emergency plans are established, implemented and maintained as documented in Manual SCD-7, SRS Emergency Plan (and other references, including those specified below.) The SCD-7 manual contains procedures to facilitate the identification of emergency situations and accidents with the potential to impact the environment, and provides definitions of appropriate responses and reporting criteria. It further defines (or provides guidance as to) how organizations can prevent and/or mitigate potential adverse scenarios.

These procedures are reviewed and revised periodically to address lessons learned and operating experience gained. They also provide the basis for periodic testing of the procedures to maintain requisite skills.

SRS emergency plans and programs include occurrences categorized as environmental emergencies. Procedures and documents that guide the Emergency Preparedness Process are as follows:

- Manual 1-01 (“Management Policies”), 4.12, “Emergency Preparedness”
- Manual SCD-7, “Savannah River Site Emergency Plan” (includes drills and exercises)
- Manual 9B, “Site Item Reportability and Issues Management (SIRIM)”
- Central Services Works Engineering Spill Response Team procedures
- USFS-SR Emergency Response and Evacuation Plan and Emergency Spill Procedure
- WSI-SRS Procedure 1-6816, “Emergency Management Plan”
- SREL Safety Manual, chapter 2, “Medical and Emergency Procedures”
- “SREL Occurrence Reporting Procedures” (EHS-94-0001)
- Resource Conservation and Recovery Act Part B Permit, Volume I, General Information, Section G, Contingency Plan.
- Memoranda of agreement (MOAs) and service level agreements (SLAs)

Monitoring and Measurement

Monitoring and measurement means that the key characteristics of SRS operations are monitored regularly. This includes effluent monitoring (radiological and nonradiological), compliance monitoring, performance monitoring, and equipment/facility monitoring (e.g., calibration of instruments).

References include the following:

- Manual 3Q1-2, (Plans and Procedures), Vol. 1, Section 1000, Procedure 1002, “SRS Environmental Monitoring Plan”
- Manual 3Q1-2 (Plans and Procedures), Vol. 1, Section 1000, Procedure 1100, “SRS Environmental Monitoring Program”
- WSRC-ESH-EMS-94-0129, “SRS EM Corrective Action Plan”
- “Environmental Geochemistry Group Operating Handbook,” July 1996
- USFS-SR Post-Burn Evaluations
- USFS-SR Biological Evaluations
- Manual SCD-4, “Assessment Performance Objectives and Criteria”
- Manual 3Q, “Environmental Compliance Manual”
- Manual 1Q (Quality Assurance), 12-1, “Control of Measuring and Test Equipment”
- Manual 1Q, Procedure 12-2, “Control of Installed Process Instrumentation”
- Manual 1Q, Procedure 15-1, “Control of Non-conforming Items”
- Manual 1-01, Procedure 5.35, “Corrective Action Program”
- Annual SRS Environmental Report
- USFS-SR Accomplishment Reports
- Individual Agency and Divisional Performance Indicators
- WSI-SRS Consolidated Assessment Schedule

Evaluation of Compliance

Specific environmental legislation and regulations are evaluated and assessed on a program- or facility-specific basis. SRS has established a process for periodically evaluating its compliance with relevant environmental regulations. This process is primarily captured in three site documents: (1) the Standards/

Requirements Identification Document (S/RID), (2) the Source and Compliance Document (SCD-4), and (3) the Assessment Manual (12Q). The procedure often is integrated into an organization’s environmental, safety, and health inspection process, which is performed in a prioritized fashion by a team of experts—including one on environmental regulatory issues. Periodically, environmental support organizations conduct regulatory assessments in particular topical areas to verify the compliance status of multiple organizations throughout SRS. Finally, external regulatory agencies and/or technical experts may conduct independent audits of compliance.

Legal and Other Requirements

EMS includes procedural mechanisms for identifying laws, regulations, DOE Orders, and other requirements. Proposed laws and regulations are monitored by the RI&ES Department via routine review of federal and state registers performed by subject matter experts for analysis and impact determinations. Identified regulatory and DOE requirements for environmental programs are included in the applicable S/RID. The environmental functional area within the S/RID addresses activities required to protect the environment and the health of the public and workers, ensuring compliance with applicable standards, laws, and regulations, as well as with DOE orders and directives. The S/RID scope addresses environmental protection, environmental policy management, permitting, environmental monitoring, surveillance and inspections, environmental control standards, pollution prevention, record keeping, reports and notifications, key interfaces, and documents and references. Applicable references: S/RID for M&O is SRNS-RP-2008-00086-020-M&O; S/RID for LWO is WSRC-RP-94-1268-020-LWO.

Compliance Evaluations

Consistent with Manual 12Q, “Assessment Manual,” a self-assessment plan is published annually to evaluate environmental regulatory compliance. It has the flexibility to make during-the-year adjustments as operational concerns surface. Records documenting results of the periodic evaluations are retained in accordance with regulatory direction and records management programs.

The conduct of scheduled self-assessments is captured and tracked in the organizational integrated

schedule, and all action items generated by that evaluation process are entered into Site Tracking, Analysis, and Reporting system (STAR). Similarly, audits and inspections conducted by external regulators (i.e., EPA, SCDHEC, and DOE) are captured in the integrated schedule, and the resulting corrective actions are tracked to completion in STAR.

Corrective Actions

In accordance with Manual 1-01, Procedure 5.35, "Corrective Action Program," and Manual 1B, Procedure 4.23, "Corrective Action Program," identified opportunities for improvement (OFI), observations, and findings are entered into STAR, where they are monitored routinely for progress and completion by multiple levels of management. As an example, an OFI identified during the external audit of the EMS identified the need to improve the process whereby environmental aspects are identified and evaluated, significance determinations are made, and necessary adjustments to processes/programs/procedures are implemented. This subsequently was captured in STAR, and is being tracked to completion.

Nonconformance; Corrective and Preventive Actions

Nonconformance and corrective and preventive actions include EMS nonconformance as a part of the site's quality assurance (QA) program. The application of QA procedures, therefore, supports the total EMS. For example, use of the nonconformance report form applies to environment-related equipment, instruments, facilities, and procedures. Also, instances of "nonconformance" identified by assessments and evaluations are recorded and dispositioned according to established procedures, utilizing the following resources:

- Quality Assurance Management Plan
- SRM 226.1.1C, Integrated Performance Assurance Manual, Section 8, "Corrective Action Processing and Closure Verification"
- Manual 1-01, Procedure 5.35, "Corrective Action Program"
- Manual 12Q (Assessment Manual), Procedure FEB-1, "Facility Evaluation Board"
- Manual 1Q, "Quality Assurance Manual"

- WSI-SRS Procedure 1-3700, "Improvement/Corrective Action Management Program"
- USFS-SR Handbook, 6309.11, "Contract Administration"
- "Evaluation and Cleanup of SREL Research Sites" (A-98-0002)

Control of Records and Documents

The identification, maintenance, and disposition of environmental records and documents are required by the SRS EMS. The site's records management program incorporates environmental records for these purposes. Specific documentation for programmatic environmental activities is addressed in department-level procedures. For example, Regulatory Integration and Environmental Services (RI&ES) maintains records of correspondence with regulatory agencies. Environmental training records are maintained by the line organization requiring and conducting the training as well as by the site Training Department. EECs completed by facilities for specific activities are forwarded to and maintained by the site M&O contractor. Among the various records and documents management procedures in use at SRS are the following:

- DOE Order 1324.5A, "Records Management Program"
- Manual 1Q, Quality Assurance Manual, QAP 5-1, "Instructions, Procedures, and Drawings"
- Manual 1Q, Quality Assurance Manual, QAP 6-1, "Document Control"
- Manual 1Q, Procedure 17-1, "Quality Assurance Records"
- Manual 1B (Management Requirements and Procedures), Procedure 3.11, "WSRC Document and Correspondence Numbering System"
- Manual 1B, Procedure 3.31, "Records Management"
- Manual 1B, Procedure 3.32, "Document Control"
- WSRC IM-93-0060, "Sitewide Records Inventory and Disposition Schedule (RIDS)," Section

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- Savannah River Implementing Plan (SRIP) 200, Chapter 241.1, “Records Management Program”
- WSI–SRS Procedure 1–1507, “Records Management Requirements”
- U.S. Forest Service Handbook, 6209.11, “Records Management”
- ESH 94–0033, “SREL Environmental Management Plan”

Internal Audits

SRS audits are incorporated into the DOE and contractor assessment programs to verify that the site’s EMS is functioning as intended. Environmental assessments include performance objectives and criteria for management system review. For example, Source and Compliance Document 4 (SCD–4) Functional Area 07 contains the performance objectives and criteria for the self-assessment of environmental management and technical/compliance requirements.

SRS utilizes a Facility Evaluation Board (FEB) to conduct independent performance-based assessments of site programs to satisfy contractual and regulatory obligations. The independent assessment program periodically conducts performance-based assessments of facilities/projects, support departments, and SRS programs. Other activities for which oversight of environment, safety, health, radiological controls, or quality assurance is required also are assessed.

The M&O’s Office of Contractor Assurance prepares the annual FEB schedule for the M&O president. Determination of facility assessment scheduling considers, but is not limited to, the following criteria:

- Hazard level, including (1) radiological categories 1, 2, or 3 and (2) industrial (inherent facility safety and health hazards)
- Facility risk, as defined by the facility’s authorization basis documentation
- Operational status (shutdown, standby, operating, startup test mode, or closure)
- Number and frequency of reportable occur-

rences during the previous 12 months, including type, root-cause factors, and status of action items

- Type of last assessment
- Time since last assessment
- Grade from last FEB evaluation
- Regulatory-driven assessment frequencies
- Requests for evaluation by site management

Management Review

The SRS EMS Policy requires periodic evaluations of the effectiveness of the EMS. Guidelines are intended to keep the management review focused on continuous improvement. Oversight of SRS’s annual EMS review is the responsibility of DOE–SR’s EQMD.

- A formal external audit was conducted during the period April 28–May 1, 2009. The scope of the audit was to determine whether the EMS conforms to the requirements of DOE Order 450.1A, and had been properly implemented and maintained. The audit team determined that the EMS was in conformance, enabling the initial “declaration of conformance” required by DOE Order 450.1A. Information derived from the audit was reported to senior management.
- A formal internal assessment was conducted in accordance with the M&O contractors’ assessment program to (among other items) validate the findings, observations, and opportunities for improvement identified by the external audit. Planning and execution for conduct of the assessment was the responsibility of the EMS coordinator in cooperation with EQMD. Coordination of assessment objectives included defining scope, developing evaluation criteria, and discussing methods to be used for completing the assessment. The assessment was completed, with results reported to and approved by senior management. Corrective actions were documented in STAR, and (with the exception of one item scheduled for completion by March 31, 2010) all corrective actions have been implemented.

Senior management reviews the EMS to ensure its continuing suitability, adequacy, and effectiveness.

Reviews include assessing (1) opportunities for improvement and (2) the need for changes to the EMS. Records of the management reviews are retained in accordance with procedures, as previously addressed. Minutes from the reviews are available on the EMS intranet website.

For Further Information Should additional information be required relative to this chapter, contact Michael Roper at michael.roper@srs.gov.

