



ESH&QA

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Overall Approach

- Safety (ES&H), Quality and Security are integral to business strategy
- Compliance is a precondition of operations and earning fee
- Contractor responsible for effectively managing risk to ensure safe and secure operations (including Subcontractors)
- DOE is the owner of the mission and facilities and must know what is going on



DOE Safety Management System Policy

- Described in DOE P 450.4
- Systematically integrate safety into management and work practices at all levels
- Direct involvement of workers during the development and implementation of safety management systems is essential
- The objective, guiding principles, and core functions of safety management ... shall be used consistently in implementing safety management throughout the DOE complex



DOE Regulations

- Nuclear Safety (10 CFR 830)
 - Applicable to Hazard Category 1, 2, or 3 Nuclear Facilities
 - 1 Category-1; 24 Category-2; and 2 Category-3 Nuclear facilities
- Quality Assurance (10 CFR 830)
- Radiation Protection Program (10 CFR 835)
- All subject to Price-Anderson Amendments Act (PAAA) enforcement



Quality Assurance

Requirements for Quality Assurance Programs

- DOE Order 414.1A for non-nuclear facilities
- 10 CFR 830, Subpart A, for nuclear facilities
- DOE/RW-0333P for NRC-licensed Fort St. Vrain and TMI-2 Independent Spent Fuel storage installations



Environmental Management Systems

- DOE will require implementation of an effective environmental management system that is part of an Integrated Safety Management System (DOE Order 450.1)



Environmental Permits

- Clean Air Act (CAA):
 - The INEEL site is one facility per CAA definitions; the INEEL Research Center (IRC) in Idaho Falls is a separate facility.
 - Permits to Construct – fewer than 20 active process or facility area specific permits.
 - INEEL Title V operating permit application; broken into volumes by facility areas. Permit is expected in 2003.
 - IRC Title V operating permit



Environmental Permits

- Resource Conservation and Recovery Act (RCRA): One ID # for the INEEL and IRC; permit is broken into volumes by facilities or units.
 - Some interim status units remain with a schedule for Part B permitting.
- Clean Water Act/State Regulations: State wastewater land application permits, and EPA storm water regulations are applicable.
- Toxic Substance Control Act: No permits at this time, PCB storage under national agreement.



Environmental Agreements & Reporting

- Environmental compliance enforceable agreements:
 - RCRA Notice of Noncompliance (State & EPA): One remaining requirement is INTEC Tank Farm closure
 - RCRA Site Treatment Plan (State): Site wide
 - RCRA Voluntary Consent Order (State): Site wide agreement for inactive units
 - Federal Facilities Agreement/Consent Order (State & EPA): Site wide CERCLA cleanup



Environmental Agreements & Reporting

- INEEL is subject to numerous environmental reporting requirements, many of them requiring site-wide coordination including:
 - Emergency Preparedness and Community Right to Know Act (EPCRA) reports, emissions inventories, hazardous waste reporting, permit specific reports and tracking, environmental monitoring and surveillance reporting, and pollution prevention planning and reporting.



National Environmental Policy Act (NEPA) & Cultural Resources

Major NEPA documents:

- Programmatic Spent Nuclear Fuel and Environmental Restoration and Waste Management EIS,
- High Level Waste and Facilities Disposition EIS (Final EIS issued, Record of Decision is pending), and
- INEEL Wildland Fire Management Environmental Assessment.



National Environmental Policy Act (NEPA) & Cultural Resources

Cultural Resource Management

- INEEL has prehistoric, as well as pioneer and significant scientific historic sites requiring site-wide Cultural Resource management and consultation

Land management issues

- Petitions to list endangered species, rare sagebrush-steppe ecosystem, rights-of-way



Emergency Management

Requirements

- Maintain an “all hazards” emergency management system pursuant to DOE Order 151.1A.
- Responsive to the consequences of ANY event that threatens worker safety, the public, the environment or national security.
- Capabilities demonstrated through drill/exercise and self-assessment /evaluation programs.
- Formal agreements exist with state and local emergency response providers.

