

Information Bulletin

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Title: Procedure Compliance Is Required As Facility Status Changes

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Lessons Learned Summary: Facilities changing status from standby to decontamination and decommissioning or from one contract to another must diligently maintain procedure compliance in all activities including program functions such as management assessments and corrective actions management. Facility level procedures must implement higher level company program processes.

Procedure compliance coupled with the procedure development, review, and approval process; provide the systematic disciplined approach to implement requirements and hazard controls. Procedures implement requirements and form the basis for correct and safe operation of processes and facilities. Procedures implement each of the Integrated Environment, Safety and Health Management System (ISMS) Core Functions and provide consistency. A goal of the facility team should be zero procedure noncompliance's.

Discussion of Activities: The facility is one of several under one contractor. The contractor has central procedures for many programs. Each facility still requires specific procedures for some functions due to the unique nature of the facilities. The facility is in the process of removing fuel and fissile materials and also was involved in an extended contract change process. The contract change process started late 2003 and continued until late 2005 when DOE determined that the facility would continue with the current contractor.

Analysis: During the two year period the expectation existed that the facility transition to the new contractor was near. It was expected the new contractor would bring new procedures and processes for some of the management systems. At the facility in an effort to reduce administrative efforts, the facility assessment procedure and program diverged from the higher level company procedure requirements.

Because the change of contractor was expected soon, yearly plans for activities like independent assessments did not always include the facility. This gave the appearance that the facility was not well integrated into the independent assessment program.

Recommendations:

- Managers should reinforce the importance of procedure compliance at all times.
- Lower level procedures must implement higher level procedures and requirements.
- In spite of expected changes in programs and facility activities, procedure and program compliance must be maintained.

Cost Savings/Avoidance: Not evaluated or determined

Work Function: Conduct of Operations – Procedure Adherence

Hazards: Other

Keywords: assessments, change management

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References: RL Surveillance Report S-06-OOD-FFTF-0001

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