



NNSA Policy Letter: NAP-5

(DOE P 450.3)

Date: October 16, 2002

TITLE: Policy Letter for Standards Management

- I. **OBJECTIVE:** Establish NNSA expectations for Standards Management Programs used to select and maintain applicable standards for work performed at NNSA Headquarters and field sites.

- II. **APPLICABILITY:** NNSA federal staff and NNSA management and operating contractors, and other prime contractors as determined by NNSA Headquarters and/or field site management, shall use a defined formal process to tailor environment, safety, and health; project management; safeguards and security; quality assurance; business; and administrative standards and, as determined by NNSA management, other standards used to perform federal and contractor work. Here, the term standard encompasses federal, state, and local laws and regulations; DOE directives; DOE/NNSA requirements and mandates; and national and international consensus and generally accepted standards.

- III. **REQUIREMENTS:** NNSA is committed to the use of Standards Management Programs that are based on the tailoring authorities prescribed in 48 C.F.R. 970.5204.2. NNSA Headquarters and field sites shall have Standards Management Programs that tailor standards that are necessary and sufficient for performing work in a safe, secure, efficient, and effective manner and emphasize the desired outcome or end-state for the work. These programs shall define standards utilizing a documented process that incorporates the Standards Management Program Principles of this policy. These programs shall also implement robust change control mechanisms for establishing and maintaining standards that govern the conduct of NNSA work. This policy replaces DOE P 450.3 "Authorizing Use of the Necessary and Sufficient Process for Standards-Based Environment, Safety, and Health Management" for work at NNSA sites.

NNSA Standards Management Programs shall be based on the following principles:

1. For NNSA-wide management standards required for consistent application, the NNSA Leadership Coalition participates in and approves the corporate process, including the extent of stakeholder involvement and confirmation, and the standards.

2. For field site-specific standards, the NNSA site management and prime contractor management participate in and agree on the process, including the extent of stakeholder involvement and confirmation, and the standards.

3. Standards are based on the work, the environment in which the work is performed, and the hazards or risks (operational and administrative) associated with the work.

4. NNSA Headquarters and field site processes include robust mechanisms for establishing and maintaining standards that govern the conduct of NNSA work.
5. People qualified by knowledge, experience, and training select or develop and confirm the standards.
6. The process is documented and the adequacy of the standards selected is justified; justification is not required for standards not selected.
7. The selected standards are accepted by all as the basis for the performance of work and oversight.
8. To the extent possible, standards are outcome based (i.e., establish the “what” versus the “how”).
9. Preference is given to consensus and generally accepted standards. If consensus or generally accepted standards are not sufficient, site-specific standards are developed.
10. Special or supplemental contract clauses do not constrain the standards management process.
11. Seek process efficiencies through multisite benchmarking and collaboration in the selection of standards for similar work.

IV. RESPONSIBILITIES:

1. The Associate Administrator for Facilities and Operations owns this policy and any changes and deviations from this policy will be accomplished in accordance with NNSA Policy Letter NAP-1.
2. The NNSA Leadership Coalition approves the NNSA corporate standards management process, charters standards identification teams to select or develop the NNSA-wide management standards required for consistent application, and reviews, comments, and approves NNSA-wide standards.
3. NNSA Site Managers will approve all standards placed in their contracts.
4. NNSA Site Managers will concur with standards approved by others for work at their sites as necessary to achieve effective site-wide integration.
5. NNSA Site Managers will own, develop, document, and manage the standard management process for their Site.

V. EXPLANATORY COMMENTS:

The attached Explanatory Document provides more detailed and clarifying comments for the implementation of this policy.

VI. POINT OF CONTACT FOR ADMINISTRATION POLICY LETTER: Associate Administrator for Facilities and Operations, (202) 586-7349.

A handwritten signature in black ink, appearing to read 'L. Brooks', is centered on the page.

Linton Brooks
Acting Administrator

Attachment:
Explanatory Document

NATIONAL NUCLEAR
SECURITY ADMINISTRATION
POLICY FOR STANDARDS
MANAGEMENT

EXPLANATORY DOCUMENT

I. OBJECTIVE

Establish NNSA expectations for Standards Management Programs used to select and maintain applicable standards for work performed at NNSA Headquarters and field sites.

This policy recognizes that many standards have already been selected through various processes over the past several years, i.e. Work Smart Standards (WSS), Standards and Requirements Identification Documents (S/RIDs), Directives Management. It is expected that existing standards management programs will be reviewed and, as appropriate, modified to meet this policy. Accordingly, this policy approves existing NNSA standards management programs under the Laws Clause [48 C.F.R. 970.5204.2] provided they meet this policy.

Application of this policy is as follows:

a. **All work performed at NNSA sites located at NNSA landlord locations.**

The policy is to be implemented by NNSA managers for the identification of standards that govern all work performed on the NNSA site unless mutually agreed upon for non-NNSA work.

b. **All work performed at NNSA sites located at non-NNSA landlord locations.**

In situations where NNSA has a site within the boundaries of a site owned and operated by another DOE program office, the applicable landlord standards will be utilized when performing landlord

functions, unless mutually agreed upon. Landlord functions refer to such activities as lock-out/tag-out, environmental monitoring, dosimetry monitoring, security access control, etc. However, the policy will be utilized by NNSA managers to identify and manage NNSA work-specific standards.

c. **NNSA work performed at non-NNSA sites:** Where NNSA work is performed at non-NNSA sites, the policy does not apply unless mutually agreed upon.

II. APPLICABILITY

NNSA federal staff and NNSA management and operating contractors and other prime contractors, as determined by NNSA Headquarters and/or field site management, shall use a defined formal process to tailor environment, safety, and health; project management; safeguards and security; quality assurance; business; and administrative standards and, as determined by NNSA management, other standards used to perform federal and contractor work.

The work performed by federal employees is also subject to this policy. This would require the NNSA to expand their standards management programs to include the tailoring of standards to the federal activities.

The standards management program is a documented, formal process that provides for the effective evaluation of work, associated hazards or risks, and standards.

Here, the term standard encompasses federal, state, and local laws and regulations; DOE directives; DOE/NNSA requirements and mandates; and national and international consensus and generally accepted standards.

Any standard can be included in contracts if determined to be “necessary and sufficient” utilizing the site’s standards management program.

While laws and regulations are necessary if they are applicable to NNSA work, they should be evaluated from a sufficiency perspective to determine the need for additional standards. Additionally, if applicable laws or regulations are determined not to be necessary, regulatory exemptions will be pursued.

DOE/NNSA requirements and mandates refer to direction (e.g., development of major corrective action plans) that will have significant impact on NNSA.

Guides and Manuals often associated with DOE Orders may be considered, but are not required to be included in the standards management set.

III. REQUIREMENTS

NNSA is committed to the use of Standards Management Programs that are based on the tailoring authorities prescribed in 48 C.F.R. 970.5204.2.

The authority provides for the optional tailoring of ES&H requirements. This policy is expanding the authority to address the tailoring of standards beyond ES&H.

NNSA Headquarters and field sites shall have Standards Management Programs that tailor standards that are necessary and sufficient for performing work in a safe, secure, efficient, and effective manner and emphasize the desired outcome or end-state for the work. These programs shall define standards utilizing a documented process that incorporates the Standards Management Program Principles of this policy.

These programs shall also implement robust change control mechanisms for establishing and maintaining standards that govern the conduct of NNSA work.

The final outcome of the process is the identification of “necessary and sufficient” standards that when properly implemented, provide for adequate protection of the public, workers, and environment; security interests; and other resources.

This policy replaces DOE P 450.3 “Authorizing Use of the Necessary and Sufficient Process for Standards-Based Environment, Safety, and Health Management” for work at NNSA sites.

This policy provides a principle-based approach to derive a standards management program rather than imposing prescriptive requirements in applying the necessary and sufficient process. Therefore, DOE P 450.3 and related guides and manuals serve as reference documents.

NNSA Standards Management Programs shall be based on the following principles:

The overall strategy for this policy is to clearly and succinctly communicate what the Administrator expects NNSA to achieve.

1. *For NNSA-wide management standards required for consistent application, the NNSA Leadership Coalition participates in and approves the corporate process, including the extent of stakeholder involvement and confirmation, and the standards.*

NNSA-wide management standards may be identified for application throughout NNSA.

The NNSA Leadership Coalition is responsible for establishing a standards

management program for NNSA Headquarters and for chartering corporate Standard Identification Teams (SIT) composed of Headquarters and field members (federal and contractor), including representation from the office(s) of primary interest where applicable.

Confirmation validates the adequacy and feasibility of the standards selected and may entail third party experts.

2. For field site-specific standards, the NNSA site management and prime contractor management participate in and agree on the process, including the extent of stakeholder involvement and confirmation, and the standards.

3. Standards are based on the work, the environment in which the work is performed, and the hazards or risks (operational and administrative) associated with the work.

The process will focus on the work and the associated hazard or risks to define the standard.

4. NNSA Headquarters and field site processes include robust mechanisms for establishing and maintaining standards that govern the conduct of NNSA work.

This is intended to address all aspects of a standards management program including change control and configuration management, training programs, documentation, etc.

5. People qualified by knowledge, experience, and training select or develop and confirm the standards.

The standards management program must have the appropriate processes and documentation to demonstrate the

qualification of the participants involved in standards selection, development, and confirmation. Documentation will include statements of specific knowledge, experience, and training for each participant. If needed, NNSA will make additional subject matter experts available to assist in the objective selection or development of standards and/or in the confirmation process.

6. The process is documented and the adequacy of the standards selected is justified; justification is not required for standards not selected.

The standards management program must be documented in such a way as to communicate the fidelity of the processes and rigor of implementation. The team emphasized that justification for not choosing standards is not required.

7. The selected standards are accepted by all as the basis for the performance of work and oversight.

The team emphasized that the established standards are the basis for oversight.

8. To the extent possible, standards are outcome based. (i.e., establish the “what” versus the “how”.)

The intent of this principle is to drive towards outcome based standards as much as possible.

9. Preference is given to consensus and generally accepted standards. If consensus or generally accepted standards are not sufficient, site-specific standards are developed.

Emphasis is on the adoption of industry standards. Use of site-specific standards will be minimized.

10. *Special or supplemental contract clauses do not constrain the standards management process.*

For those contract clauses that interfere with this policy, seek formal modification or deletion of contract clauses.

11. *Seek process efficiencies through multi-site benchmarking and collaboration in the selection of standards for similar work.*

NNSA sites are encouraged to consider the standards for similar work of other sites and to collaborate with other sites in selecting standards for common work and common hazards or risks.

IV. RESPONSIBILITIES

1. *The Associate Administrator for Facilities and Operations owns this policy and any changes and deviations from this policy will be accomplished in accordance with NNSA Policy Letter NAP-1.*

2. *The NNSA Leadership Coalition approves the NNSA corporate process, charters standard identification teams to select or develop the NNSA-wide management standards required for consistent application, and approves such standards.*

The Leadership Coalition will encourage participation of the office(s) of primary interest and appropriate stakeholders.

3. *As a member of the Leadership Coalition, all Deputy Administrators, Associate Administrators, and Site Managers, will review and comment on*

proposed NNSA corporate processes and standards.

4. *NNSA Site Managers will approve all standards placed in their contracts.*

5. *NNSA Site Managers will concur with standards approved by others for work at their sites as necessary to achieve effective site-wide integration.*

6. *NNSA Site Managers will own, develop, document, and manage the standards management process for their site.*