
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 2008, SRS continued to meet or exceed performance expectations with respect to the management of environmental protection media (air, water, waste programs, etc.).

The Management and Operating (M&O) contract for SRS transferred on August 1, 2008, from Washington Savannah River Company (WSRC) to Savannah River Nuclear Solutions, LLC (SRNS), and with it transitioned the responsibility for oversight of the site's Environmental Management System (EMS). This chapter focuses on the integration of numerous environmental requirements mandated by existing statutes, regulations, and policies implemented through the 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, as DOE Order 450.1A, "Environmental Protection Program." The new revision mandated a formal "declaration of conformance" to the EMS requirements not later than June 30, 2009. SRNS has initiated activities—including the establishment of supporting environmental, energy, and transportation management objectives and targets—to enable this "declaration," and is on track to meet the June 30 deadline. The development of corresponding EMS performance metrics is in progress.

The following is the text of the EMS Policy in effect through 2008:



Savannah River Site Environmental Management System Policy September 2008



OBJECTIVE

To implement sound stewardship practices that are protective of the air, water, land, and other natural and cultural resources impacted by Savannah River Site (SRS) operations. All activities on SRS shall be conducted in compliance with applicable laws and regulations providing for the protection of public health and the environment, to reduce the use of procedures and processes that produce hazardous wastes, and to seek ways to continuously improve the performance of activities protective of the environment. The objective of this policy is to establish a consistent site-wide approach to environmental protection through the implementation of an Environmental Management System (EMS) as part of the overall Integrated Safety Management System (ISMS). The EMS provides for the systematic planning, integrated execution, and evaluation of Site activities for (1) public health and environmental protection, (2) pollution prevention (P2), (3) compliance with applicable environmental protection requirements and (4) continuous improvement of the EMS.

DIRECTIVE

Recognizing that many aspects of operations carried out at SRS may impact the environment, the SRS policy is that all employees, contractors, subcontractors, and other entities performing work at SRS shall abide by the directives in this document. This document serves as the primary documentation for the environmental goals and objectives of SRS and shall be available to the public. It shall be centrally maintained and updated as necessary to reflect the changing needs, mission, vision, and goals of SRS. The Department of Energy–Savannah River Operations Office (DOE–SR), Savannah River Nuclear Solutions (SRNS), Washington Savannah River Company (WSRC), Wackenhut Services Incorporated–Savannah River Site (WSI–SRS), Savannah River Ecology Laboratory (SREL), National Nuclear Security Administration–Savannah River Site Office (NNSA–SRSO), National Nuclear Security Administration–Office of Site Engineering/Construction Management (NNSA–OSECM), the United States Forest Service–Savannah River (USFS–SR), Parsons, and Shaw AREVA MOX Services endorse the principles stated in this policy.

The Environmental Management System pursues and measures continuous improvement in performance by establishing and maintaining documented environmental objectives and targets that correspond to SRS's mission, vision, and core values. The environmental objectives and targets shall be established for relevant functions including DOE–SR, NNSA–SRSO, NNSA–OSECM, and all contractors, subcontractors, and other entities performing work at SRS for all activities having actual or potentially significant environmental impacts.

DOE–SR, NNSA–SRSO, and NNSA–OSECM, and all contractors, subcontractors, and other entities performing work at SRS shall:

1. Manage the SRS environment, natural resources, products, waste, and contaminated materials so as to eliminate or mitigate any threat to human health or the environment at the earliest opportunity and implement process improvements, as appropriate, to ensure continuous improvements, as appropriate, to ensure continuous improvement of performance in environmental management.

2. Develop policies, procedures, and training as needed to identify activities with significant environmental impacts; to manage, control, and mitigate the impacts of these activities; and to assess performance and implement corrective actions where needed.
3. Implement a pollution prevention program to reduce waste generation, releases of pollutants, future waste management and pollution control costs, and to promote energy efficiency.
4. Conduct operations in compliance with all applicable federal, state, and local laws, regulations, statutes, executive orders, directives, and standards.
5. Work cooperatively and openly with appropriate local, state, federal agencies, public stakeholders, and site employees to prevent pollution, achieve environmental compliance, conduct cleanup and restoration activities, enhance environmental quality, and ensure the protection of workers and the public.
6. Design, develop, operate, maintain, decommission, and deactivate facilities and perform operations in a manner that shall be resource efficient and will protect and improve the quality of the environment for future generations and continue to maintain SRS as a unique national environmental asset.
7. Recognize that the responsibility for quality communications rests with each individual employee and that it shall be the responsibility of all employees to identify and communicate ideas for improving environmental protection activities and programs at the site.
8. Ensure the early identification of, and appropriate response to, potential adverse environmental impacts associated with DOE operations, including as appropriate, preoperational characterization and assessment; and effluent and surveillance monitoring.
9. Promote the long-term stewardship of SRS's natural and cultural resources throughout its operational, closure, and post-closure life cycle.

Adherence to and programmatic implementation of this policy shall be the responsibility of the DOE–SR, NNSA–SRSO, and NNSA–OSECM managers in coordination with the contractors, subcontractors, and other entities performing work at SRS.

Original policy document signed by the following:

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SRS EMS Implementation

The International Organization for Standardization (ISO) 14001 Standard, Environmental Management System, defines the structure for implementing EMS and improving environmental performance. The process-based structure of the ISO 14001 Standard is based on the “Plan-Do-Check-Act” improvement cycle. The standard 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. The SRS EMS no longer is subject to an independent third-party audit to maintain ISO 14001 certification; however, it does undergo an annual internal assessment, with DOE–SR oversight, that evaluates conformity to the 17 elements of the (ISO) 14001 Standard. Additionally, under the provisions of the new DOE Order 450.1A, there is a requirement that in the initial year of implementation (i.e., 2009) and every third year thereafter, an independent external audit is required to ensure continued conformance to the 17 elements of the ISO 14001 Standard, as well as to specific requirements contained within the order. The sections that follow describe the 17 elements that demonstrate SRS implementation of the ISO 14001 Standard.

Environmental Policy

The SRS EMS 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 sitewide approach to environmental protection through the implementation of an EMS as part of the overall 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), (3) compliance with applicable environmental protection requirements, and (4) continuous improvement of the EMS.

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. SRS has determined that the following aspects of its operations have the potential to affect the environment:

- Air pollutants
- Alternative fuel use and petroleum conservation
- Asbestos emissions
- Biological hazards
- Building performance and sustainable design
- Chemical use and storage
- Contaminated site disturbance
- Cultural/historical resource disturbance
- Deactivation and demolition
- Discharge of wastewater systems or groundwater
- Drinking water contamination
- Ecological research
- Electronics management
- Energy efficiency and greenhouse gases
- Environmental remediation development, demonstration, and deployment
- Hazardous or mixed waste generation and management
- Hazardous or radiological material or waste packaging and transportation
- Industrial waste generation and management
- Interaction with wildlife and habitat
- Managing surplus property and materials
- PCB contamination

- Pollution prevention
- Procurement of environmentally preferable goods
- Radioactive material use and storage
- Radioactive waste generation and management
- Radionuclides
- Renewable energy
- Solid waste (hazardous, nonhazardous, sanitary, nonradiological)
- Storage of hazardous, mixed, or radioactive materials or wastes in tanks
- Surface water or stormwater contamination
- Transportation (fleet) management
- Use, reuse, and recycling of resources
- Underground and aboveground storage tank management
- Water use (conservation)
- Nanomaterials

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 requirements related to environmental protection activities undertaken by the M&O contractor 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. This S/RID addresses the technical and programmatic requirements from applicable standards, laws, and regulations.

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. The SRS goals and objectives are described in the following document references:

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 WSI–SRS with respect to major operations or programs defined by DOE–SR. Because of security requirements, the WSI–AOP is not available publicly; however, information about it can be obtained by contacting the manager of WSI'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.

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. EMS awareness training is included within the General Employee Training Program for visitors and subcontractors. Additionally, all site employees are required to complete Consolidated Annual Training each year that contains EMS information.

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, facilities decommissioning, and related issues. Ex-officio members from DOE, the U.S. Environmental Protection Agency Region IV, the South Carolina Department of Health and Environmental Control, 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.

Documentation

The following sources document ways that various SRS organizations describe or manage their environmental management systems:

- "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
- "SRS Environmental Management System Policy"

Operational Control

The operational control element of the EMS is intended to ensure that operational controls are in place to carry out the environmental policy-related activities of regulatory compliance, pollution prevention, and continuous improvement by SRS management. The Assisted Hazards Analysis process and Environmental Evaluation Checklists (EECs) are vital components of this program.

Emergency Preparedness and Response

SRS emergency plans and programs include occurrences categorized as environmental emergencies. Documents that guide the emergency preparedness process are referenced below.

- 1-01 ("Management Policies"), 4.12, "Emergency Preparedness"
- SCD-7, "Savannah River Site Emergency Plan" (includes drills and exercises)
- 9B, "Site Item Reportability and Issue 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)
- Memoranda of agreement (MOAs) and service level agreements (SLAs)
- Resource Conservation and Recovery Act Part B Permit, Volume I, General Information, Section G, Contingency Plan.

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:

- 3Q1–2, (Plans and Procedures), Vol. 1, Section 1000, Procedure 1002, “SRS Environmental Monitoring Plan”
- 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
- SCD–4, “Assessment Performance Objectives and Criteria”
- 3Q, “Environmental Compliance Manual”
- 1Q (Quality Assurance), 12–1, “Control of Measuring and Test Equipment”
- 1Q, 12–2, “Control of Installed Process Instrumentation”
- Annual SRS Environmental Report
- USFS–SR Accomplishment Reports
- Individual Agency and Divisional Performance Indicators
- 1Q, 15–1, “Control of Nonconforming Items”
- 1–01, 5.35, “Corrective Action Program”
- 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—and at least semiannually—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.

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”
- 1–01, 5.35, “Corrective Action Program”
- 12Q (Assessment Manual), FEB–1, “Facility Evaluation Board”
- 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 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. EECs completed by facilities for specific activities are forwarded to and maintained by RI&ES, according to the following documents:

- DOE Order 1324.5A, "Records Management Program"
- 1Q, 17.0, "Quality Assurance Records"
- 1B (Management Requirements and Procedures), 3.11, "WSRC Document and Correspondence Numbering System"
- 1B, 3.31, "Records Management"
- 1B, 3.32, "Document Control"
- WSRC IM-93-0060, "Sitewide Records Inventory and Disposition Schedule (RIDS)", Section IV: "Environmental"
- 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 M&O assessment programs to verify that the site's EMS is functioning as intended. 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 performs performance-based assessments of facilities/projects, support departments, and SRS programs. Other activities for which environment, safety, health, radiological controls, or quality assurance oversight 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 occurrences 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 Environmental Quality Management Division.

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