

**DEPARTMENT OF ENERGY
OFFICE OF ENVIRONMENTAL
MANAGEMENT
ENVIRONMENTAL MANAGEMENT
CONSOLIDATED AUDIT PROGRAM
(EMCAP)**



On December 5, 2002, EM-1 issued the following memo (Memo #1) to the Field and Operations Offices regarding EMCAP. This memo essentially did three things. First it re-directed FY 02 carryover funding from the National Analytical Management Program (NAMP) for analytical services activities to DOE ORO EM. Secondly, it formally named David Bottrell as the EM-3 Program Manager over EMCAP and David Carden as the EMCAP Manager. And finally it relayed EM-1 expectation for “EM Programs to actively participate in support of this program and use its results to conserve EM resources and improve data quality and consistency.”



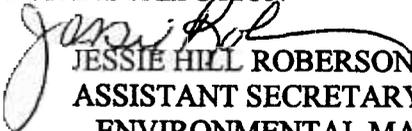
Department of Energy

Washington, DC 20585

December 5, 2002

MEMORANDUM FOR DISTRIBUTION

FROM:


JESSIE HILL ROBERSON
ASSISTANT SECRETARY FOR
ENVIRONMENTAL MANAGEMENT

SUBJECT:

Remaining Fiscal Year 2002 National Analytical
Management Program Funding for Analytical
Services Program Activities

The purpose of this memorandum is to direct remaining Fiscal Year 2002 funding that is being carried over at the Idaho Operations Office (DOE-ID), National Analytical Management Program (NAMP) for Analytical Service Program activities. Over the last year, we have completed many necessary changes to assess and improve our focus on accelerated risk-based cleanup and closure. Effective planning, collection, assessment, and use of environmental data have always been and will continue to be critical activities. The resulting products ensure confidence and sustained defense of long-term program decisions supporting closure objectives, while directly reducing both risk to human health and the environment and risk of not properly managing waste to accelerate closure. To ensure this effort continues, I am directing DOE-ID to transfer existing carryover funds as defined in Attachment 1.

A critical process in assuring reliability of environmental data to support, document, and defend our program decisions is assessment of data generators producing characterization and monitoring information for the compliance, remediation, management, treatment, storage, packaging, and transport decisions. The Environmental Management Consolidated Audit Program (EMCAP) under the responsibility of the Assistant Manager for Environmental Management (EM) at the Oak Ridge Operations Office (ORO) provides this assessment service. Attachment 2 describes EMCAP, for which NAMP carryover funding has been earmarked. I expect EM programs to actively participate in support of this program and use its results to conserve EM resources and improve data quality and consistency. The Office of Operations Oversight (EM-3) is responsible to ensure DOE-ID, NAMP and DOE-ORO, EMCAP execute this direction. If you have any questions, please contact David Bottrell at david.bottrell@em.doe.gov or at (301) 903-7251.

Attachments



Distribution

Warren E. Bergholz, Jr., Acting Manager, Idaho Operations Office (ID)
Jack R. Craig, Deputy Manager, Ohio Field Office (OH)
Keith A. Klein, Manager, Richland Operations Office (RL)
Roy J. Schepens, Manager, Office of River Protection (ORP)
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Jeffrey M. Allison, Acting Manager, Savannah River Operations Office (SR)
Dr. Inés Triay, Manager, Carlsbad Field Office (CBFO)
William E. Murphie, Manager, Portsmouth/Paducah Field Office (PPFO)

cc:

W. John Arthur, III, Manager, Albuquerque Operations Office (AL)
Marvin E. Gunn, Jr., Manager, Chicago Operations Office (CH)
Kathleen Carlson, Manager, Nevada Operations Office (NV)
Camille Yuan-Soo Hoo, Manager, Oakland Operations Office (OAK)
James A. Turi, Acting Manager, Oak Ridge Operations Office (OR)
Rita Bajura, Director, National Energy Technology Laboratory (NETL)
Jack Tillman, Director, Office of Environment, Science and Technology,
Albuquerque Operations Office (AL)
Anibal Taboas, Assistant Manager, Office of Program and Project Management,
Chicago Operations Office (CH)
Carl Gertz, Assistant Manager for Environmental Management,
Nevada Operations Office (NV)
Roger H. Liddle, Acting Assistant Manager for Environment and Nuclear Energy,
Oakland Operations Office (OAK)
Gerald Boyd, Assistant Manager for Environmental Management,
Oak Ridge Operations Office (OR)
Celinda Crawford, Acting Associate Director for Environmental Management and
Defense Programs, National Energy Technology Laboratory (NETL)

ATTACHMENT 1

“This referenced attachment is not included. Its purpose was the immediate distribution of FY02 funding to ensure continuity of EM-3 Programs. EMCAP funding establishes and maintains program infrastructure, not Field/Operations Office participation. Site-specific roles, contributions, and benefits will develop as EMCAP evolves to meet the program’s collective needs.”

Environmental Management Consolidated Audit Program (EMCAP):

Scope of EMCAP Management

Environmental Management (EM) requires a high quality audit program for certain internal and commercial services that represent a significant vulnerability to the EM mission if improperly managed. At present, these services include commercial and Department of Energy (DOE) internal analytical laboratories that produce data for making EM decisions, and commercial waste treatment, storage, disposal, and recycling facilities (TSDRFs) utilized for disposition of EM radioactive waste. The EMCAP fulfills EM's audit needs and accelerates closure by ensuring a pool of qualified service providers is readily available for reliable analysis of EM samples and for treatment and disposition of EM waste. By placing emphasis on assuring quality commercial services, DOE can close EM operated internal laboratories and waste treatment facilities without impacts to closure schedules and without sacrificing confidence to support, document, and defend our actions.

EMCAP ensures efficient planning and scheduling for the services under its purview. This includes complete definition of the facilities appropriate for assessment that support the EM complex, ensuring qualified audit participants that represent the EM complex, and efficiency in audit frequency and timing. By efficient logistical management, EMCAP will remove the site-specific need for resource intensive audit programs allowing EM sites to focus their attention on achieving closure and regulatory compliance

EMCAP incorporates a National Standard (Statements of Work/contracts) for analytical services to define data generation and reporting requirements consistent with user needs / regulatory requirements (ISO 17025 basis). Standardization of requirements will include DOE's internal environmental laboratories to demonstrate contractual equity (make or buy decisions) and ensure consistent availability, confidence, and flexibility of analytical information sources critical to meet closure needs with shrinking resources.

Background

EMCAP was formed in 1999 as a consensus effort by a team of DOE and contractor representatives from across the EM complex. DOE Oak Ridge Operations Office (ORO) initiated the formation of the EMCAP team after developing a local DOE managed audit program for commercial analytical laboratories and TSDRFs. Since EMCAP's formation, DOE ORO has

continued to be aggressively involved in policy development, operational management, and continuous improvement.

EMCAP history and major users dictate that operational control of the program be located at a Closure Site. These collective facilities (particularly Oak Ridge, Fernald, and Rocky Flats) initially developed and continue to support this program recognizing efficiencies to meet internal needs, improve assessment performance, and avoid unnecessary costs of redundant operations. Oak Ridge's historical involvement, authoritative DOE resources with strong backgrounds in auditing environmental laboratories/TSDRFs, and freedom from perceived internal laboratory conflicts of interest make ORO-EM the best choice to continue EMCAP implementation and management.

Implementation

The Oak Ridge Operations Office Assistant Manager for Environmental Management (AMEM) provides direction, management, and coordination to conduct EMCAP audits across the EM complex and to apply Standard Operating Procedures to make decisions regarding the acceptability of laboratory analytical services and commercial radioactive waste TSDRFs within the scope of EMCAP. The EMCAP Manager must be a subject matter expert (SME) in the fields of analytical services and waste treatment, storage, and disposal. The AMEM has designated an EMCAP Manager (David Carden at (865) 576-9262 or cardendm@oro.doe.gov). The specific responsibilities of the EMCAP Manager include ensuring:

- 1) A viable and functional EMCAP which provides effective and quality auditing services based on standard procedures and audit criteria;
- 2) A technically and legally defensible basis to meet long-term liabilities;
- 3) Close, effective, and timely communications with the EM complex to determine audit needs and scope for analytical laboratories and TSDRFs;
- 4) A coordinated audit schedule leveraging audit needs recognizing available auditor resources and geographic factors to yield adequate, timely, and cost effective audits meeting collective EM needs;
- 5) A competent EMCAP staff to maintain operations;
- 6) A pool of EMCAP auditors qualified in accordance with defined and technically defensible auditor qualification standards;
- 7) A functional Web-based EMCAP Data System is available to all EM staff requiring access;
- 8) Protection and efficient retrieval of EMCAP records;
- 9) Personal sign off on all audit reports and decisions affecting the acceptability of services prior to distribution;

- 10) Oversight of EMCAP audit performance in the field through EMCAP Manager (or designee) participation in a sufficient number of audits to ensure audit quality and consistency; and
- 11) Participation in National meetings and routine telecons representing EMCAP for the DOE complex

EM-3 is accountable to the Assistant Secretary for EM to ensure DOE-ORO maintains EMCAP and to establish overall policy and program direction for EMCAP and for NAMP at DOE-ID.

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On February 12, 2003, EM-1 issued the following memo (Memo #2) and Immediate Risk Reduction Action Plan (IRRAP) to the Field and Operations Offices regarding EMCAP. This memo and IRRAP were issued to recognize EMCAP as a DOE Best Practice and to reinforce Memo #1. Although it does contain specifics, an information request for site points of contract (Federal and Contractor) and audited facility usage will soon be issued by the EMCAP Manager to bring all cognizant EM offices or programs onboard with EMCAP.



Department of Energy

Washington, DC 20585

February 12, 2003

5-18-03

MEMORANDUM FOR DISTRIBUTION

FROM:


JESSIE HILL ROBERSON
ASSISTANT SECRETARY FOR
ENVIRONMENTAL MANAGEMENT

SUBJECT:

Implementation of the Environmental Management
Consolidated Audit Program

In considering how to maximize the utilization of the Office of Environmental Management (EM) assets and as a follow-on to my December 5, 2002, memorandum relative to this subject, the Environmental Management Consolidated Audit Program (EMCAP) was identified as a best practice during the complex-wide review for EM risk reduction activities and is further discussed in the attached Immediate Risk Reduction Action Plan (IRRAP-005-02).

All cognizant EM offices or programs shall ensure that EMCAP is the sole provider for audits of analytical laboratories and commercial mixed waste and low-level waste treatment, storage and disposal facilities (TSDF) that the EM office or program (and its contractors) use. Duplicative audits by the EM offices or programs or their subcontractors are prohibited. Additionally, EM offices or programs shall ensure that trained auditors are available to the EMCAP to support audits of analytical laboratories and commercial mixed waste and low-level waste TSDF.

As a national auditing program, programmatic responsibility for EMCAP is immediately designated to EM-3 and future funding for EMCAP will be provided directly from Headquarters.

I expect this practice to be completely implemented to allow the maximum benefit of this best practice to be realized. Details regarding the specific aspects of this best practice are provided within the attached IRRAP.

The required deliverables to be met are listed below:

Milestone: June 30, 2003 - All cognizant EM offices or programs shall ensure that EMCAP is the sole provider for audits of analytical laboratories and commercial mixed waste and low-level waste TSDFs that the EM office or program (and its contractors) use. Additionally, the EM offices or programs shall ensure trained auditors are available to the EMCAP to support audits of analytical laboratories. All cognizant EM offices or programs shall ensure that procurement departments standardize the terms and conditions of existing and proposed contracts to allow acceptance of EMCAP audit results.



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Deliverable: June 30, 2003 - All cognizant EM offices or programs shall ensure that EMCAP is the sole provider for audits of analytical laboratories and commercial mixed waste and low-level waste TSDF that the EM office or program (and its contractors) use. Adequate object evidence is a reduction in the FY 03 funding level and audits being performed on schedule to support individual sites' approved PMP dates.

Deliverables shall be provided to the EMCAP Program Manager (EM-3) in Headquarters, David Bottrell, (301) 903-7251, e-mail david.bottrell@em.doe.gov.

Attachment

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Jack Tillman, Special Advisor, Office of Technical Services,
NNSA Service Center (NNSASC)
Anibal Taboas, Assistant Manager, Office of Program and Project Management,
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Carl Gertz, Assistant Manager for Environmental Management,
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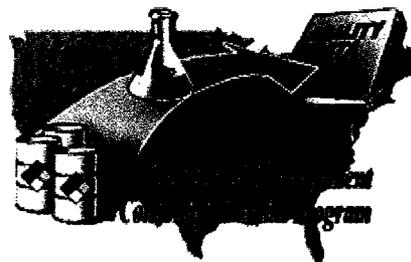
Disposing Waste, Reducing Risk

Environmental Management Consolidated Audit Program

Issue

Not all of the existing EM organizations are currently taking advantage of EM's Consolidated Audit Program (EMCAP) for analytical laboratories and Treatment, Storage & Disposal facilities (TSDF), resulting in redundant audits and potential inconsistencies in audit conduct and scope. As such, EM costs are unnecessarily increased and its assets are not utilized to their maximum.

Additionally, EMCAP is indirectly funded by EM-5, Office of Safety, Health, and Security through the National Analytical Management Program and is not formally recognized by EM. Consequently, there is no consistency in funding and the longevity of the program is suspect.

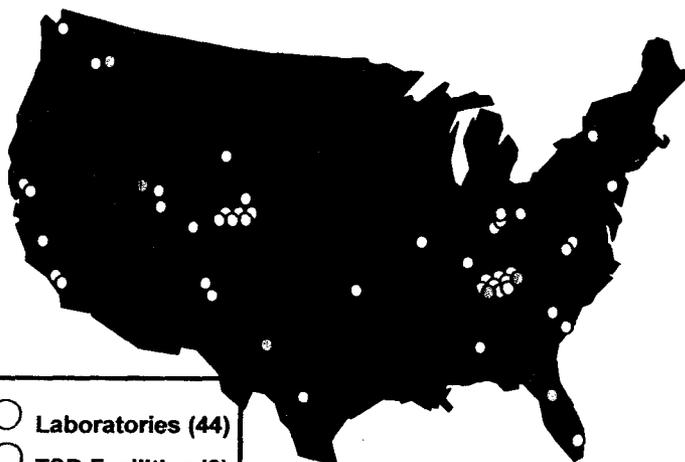


Traditional Approaches

Each contractor responsible for validity of analytical data or TSD performance conducts their own audit of the analytical laboratory or TSDF. This resulted in a significant number of redundant audits conducted on behalf of DOE to ensure that the performance of the laboratory or TSDF was acceptable. The General Accounting Office and the Inspector General identified the redundant audits of analytical laboratories as a concern in 1995.

New Approach

In 1995 and 1996 Oak Ridge Operations developed and implemented a single sample management office that was used as the basis for the current EMCAP. EMCAP is an organization that conducts audits of analytical laboratories and, more recently, TSDFs that have contracts or agreements to perform services for DOE EM programs. EMCAP uses a formalized multi-checklist audit process with trained and qualified auditors (both federal and contract personnel) to perform audit functions. There are currently 44 laboratories and six TSDFs certified by EMCAP.



- Laboratories (44)
- TSD Facilities (6)

Results

- Eliminates costly and redundant audits by other DOE contractors, thereby reducing the cost of the analytical services.
- EMCAP estimates an annual cost avoidance to DOE in excess of \$1.3 million per year, allowing resources to be diverted to other higher risk reduction opportunities.
- Consistent approach for DOE audits of analytical laboratories and TSDFs, thereby maximizing DOE EM's utilization of assets.

Immediate Risk Reduction Action Plan: Environmental Management Consolidated Audit Program (EMCAP)

To address 1995 GAO and IG concerns regarding redundancy in DOE auditing and contracting of analytical services, Oak Ridge Operations (ORO) responded by planning, developing, and implementing a single ORO Sample Management Office. Immediate reductions in redundancies were noted. From 1996 through 1999, a "grass roots" effort for a national consolidated audit program resulted in a multi-site working group forming EMCAP based on Oak Ridge Office's Sample Management Office. In 2000, EMCAP conducted its first multi-site audit and has continued to improve its program.

Currently EMCAP is funded through the National Analytical Management Program located at the Idaho National Engineering and Environmental Laboratory by the Office of Safety, Health, and Security, EM-5.

Basis for Implementation

EMCAP is a complex-wide consolidated audit program for analytical laboratories and Treatment, Storage, and Disposal Facilities (TSDFs) that have contracts or agreements to perform services for DOE EM programs. EMCAP uses a multi-checklist audit process for analytical laboratories and TSDFs. Qualified and trained auditors from a pool of auditors across the DOE complex (both contractor and federal employees) are used to perform audit functions in addition to their routine duties, thereby multi-tasking qualified resources.

Additional benefits from EMCAP that help maximize the utilization of EM's assets include:

- A defensible corrective action process;
- On-line training resources to ensure that all EMCAP auditors are trained to specific EMCAP needs;
- Consistent and cost effective means for meeting DOE Order 435.1 audit requirements;
- Increased productivity at the laboratory or TSDF, resulting in reduced costs to DOE EM;
- Centralized data management system that effectively shares audit results and information across the DOE complex; and
- Reduced QA records and a centralized records management system.

EMCAP programmatic support functions include:

- | | | |
|---|--------------------------------|-------------------------|
| - Audit scheduling | - Audit Planning | - Tracking and Trending |
| - Audit conduct | - EMCAP Reporting | - EMCAP Administration |
| - Database Management/Information Sharing | - Audit logistics | |
| - EMCAP Records System Maintenance | - Corrective Action Management | |
| - Training and Qualification of Auditors | - EMCAP Issues Management | |

Discussion of Identified Activity

When fully implemented, EM offices and programs no longer plan and execute their own audits of analytical laboratories and TSDFs. These types of audits will all be coordinated and executed through the EMCAP fulfilling the need for annual certification audits. The various EM offices and programs still support EMCAP by providing access to auditors and ensuring that the auditors remained trained to EMCAP's criteria.

When fully implemented, EMCAP performs annual audits relying on the trained contractor (or federal) auditors provided by the various EM facilities. The annual audits are conducted on the analytical laboratories and TSDFs that have contracts or agreements to perform services for DOE EM.

Activity Improvements

Since EMCAP's TSDF program is functional, EMCAP is conducting TSDF audits. However, EMCAP will continue to develop its TSDF program until it parallels its analytical program.

This service should be made available to other DOE organizations. However, if a non-EM program wishes to utilize EMCAP, the associated cost of performing and conducting the audit should be charged to that program. EMCAP should develop the capability for charge backs.

Additionally, programmatic responsibility for EMCAP is designated to EM-3 and funding for EMCAP will be provided directly from HQ as this is a national auditing program. It is important that this funding be specifically earmarked for EMCAP.

Exceptions

This Immediate Risk Reduction Action Plan is not applicable to the analytical laboratories providing services to support National Transuranic (TRU) Program (NTP) requirements. EMCAP's QA program does not currently meet the NQA-1 requirements specified for the NTP and has not been audited and approved by the EPA. Therefore, EMCAP is not qualified to perform TRU program audits. TRU program audits should continue to remain a function of the Carlsbad Field Office.

Commercial hazardous waste TSDFs are also exempted from the use of EMCAP. Currently, EMCAP is not set-up to meet the requirements for auditing hazardous waste facilities. Additionally, most hazardous waste TSDFs are local and duplicative auditing is not an issue.

For More Information:

David M. Carden, EMCAP Manager, (865) 576-9262, e-mail: cardendm@oro.doe.gov

Program documents and checklists can be found at: <http://emnamp.inel.gov/emcap/eds.html>

David Bottrell, HQ EM-3, (301) 903-7251, e-mail: david.bottrell@em.doe.gov