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To: ceq\_nepa@fs.fed.us

cc:

Subject: COMMENTS TO CEQs NATIONAL ENVIRONMENTAL POLICY ACT  
TASK FORCE

Mr. Rhey Solomon  
CEQ NEPA Task Force

I believe the Idaho National Engineering and Environmental Laboratory (INEEL) has a good case study showing how to successfully integrate Environmental Management Systems (EMS), Integrated Safety Management Systems (ISMS) and processes to implement the National Environmental Policy Act (NEPA). I am responding to the Federal Register Notice for the NEPA Task Force, Study Area C (Programmatic Analysis and Tiering), Item #2 (Environmental Management Systems). On June 17, 2002, NSF International Strategic Registrations, Ltd. registered INEEL's EMS to ISO 14001. In addition, the INEEL is ISMS certified. The INEEL was also the first Department of Energy (DOE) Laboratory to achieve Star status under the Voluntary Protection Program (VPP). The INEEL decided early in the development of the EMS to seek ISO 14001 certification and to integrate it with ISMS and the NEPA process. Many of the systems put in place to support ISMS also support the EMS and meet the requirements of ISO 14001, such as those related to training, records, documents, and emergency action.

The INEEL operates nuclear and non-nuclear facilities located in southeast Idaho for the DOE and is responsible for conducting research and development, spent nuclear fuel management, waste management, and environmental restoration. The INEEL generates radioactive, hazardous, mixed, and industrial wastes, and releases effluents to the air, water, and soil in the course of conducting business. We developed an EMS founded on the proper identification and understanding of these activities and the environmental aspects and environmental impacts associated with them. The EMS integrates environmental protection, pollution prevention, and regulatory compliance into work planning and execution throughout all work areas as a function of the Integrated Safety Management System (ISMS). We developed the EMS program elements to integrate with the five core functions of the ISMS and the elements of the ISO 14001 standard. The EMS provides effective protection to workers, the surrounding communities and the environment through implementation of the ISMS, at the same time meeting operating objectives and compliance with regulations. Finally, during the development of the EMS, the INEEL recognized the similarities between EMSs and NEPA values, and worked to integrate the NEPA process and the EMS.

The following Internet address will give you access to an INEEL ftp site containing the documents listed below. Once at the site, open the folder called "Outgoing", then open the folder called "CEQDocs." You can then copy these documents to your own system. These documents describe the relationships; that is, the integration of the EMS, ISMS systems and NEPA process discussed above (see description of documents below). I suggest that you read the paper first to understand the process we went through to create an EMS and integrate it with existing systems, such as NEPA.

INEEL FTP ADDRESS: <ftp://ftp.inel.gov/>

Thank you for your time. If you have problems accessing the above or have questions, or need further documentation, please call me at 208-526-8745. My email address is [jsi4@inel.gov](mailto:jsi4@inel.gov).

Sincerely, Dr. John S. Irving

CQ205

Advisory Scientist  
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Paper Defining and Implementing an Environmental Management System at a Large Complex Facility ? The paper highlights INEEL's approach to designing and implementing a work activity-based Environmental Management System (EMS) that integrates with the worker safety Voluntary Protection Program (VPP) and Department of Energy (DOE) Integrated Safety Management System (ISMS) processes for worker safety and environmental protection and the National Environmental Policy Act process.

PDD-1012 Environmental Management System ? The purpose of this document is to describe the company's EMS and to document the processes and systems developed to implement and deliver the environmental policy. The document describes: The roles and responsibilities for identifying environmental requirements and developing procedures and instructions, guidance, policies, and other controls for their implementation. It also describes the roles and responsibilities for implementing environmental requirements and protecting the environment during the course of performing work at the INEEL. The primary work planning processes used to identify work scope and activities; analyze environmental hazards, impacts and compliance risks; and establish environmental controls. How applicable environmental requirements are identified and flowed down to work processes through procedures and other instructions. The programs and processes used to evaluate compliance, environmental protection performance and the EMS, and provide feedback to ensure continual improvement such as the programs in training, communication, emergency preparedness, document control, records management, environmental monitoring, assessments and trending, corrective action, and management review that make up the EMS.

LST-96 Environmental Aspects Of INEEL Environmental Work Activities (List 96) ? Integrated Safety Management (ISM) requires that facility managers and employees define their work scope; identify environmental, safety and health hazards associated with their work activities; and develop and implement appropriate controls to mitigate those hazards. The ISO 14001 standard for environmental management systems requires the application of similar concepts to "identify the environmental aspects of its activities, products or services (hereafter work activities) that it can control and over which it can be expected to have an influence, in order to determine those which have or can have significant impacts on the environment." In addition, this document considers all the aspects related to significant impacts in setting its environmental objectives. The purpose of this document is to identify work activities that have environmental aspects, identify which of these may be considered significant, and identify the principal controls used to mitigate and monitor potential impacts. This document also describes the criteria used to identify and establish which work activities could have a significant impact on the environment if adequate operational controls were not implemented.

Environmental Checklist (EC) (Form 451.01) ? As a federal facility, the INEEL is subject to NEPA. The NEPA requires that environmental impacts of certain new activities are evaluated and that impacts and alternatives are considered. At the INEEL, the EC is used as the primary tool to identify activities that are subject to NEPA. This document helps tie together the proposed activity, environmental aspects, work activities, flow down of environmental requirements and instructions, and level of environmental review such as categorical exclusion, environmental assessment or environmental impact statement. The EC is key to the integration of EMS and NEPA and ISMS (flow down of requirements). The INEEL uses the EC to identify new or modified work activities (or projects) and potential environmental aspects (environmental impacts).

CQ 205

PRD-5030 Environmental Requirements for Facilities, Processes, Materials and Equipment -- The purpose of this Program Requirements Document (PRD) is to identify company-wide environmental requirements for activities at or for the Idaho National Engineering and Environmental Laboratory (INEEL). Additional facility/organization/project-specific environmental regulatory or permit requirements, if any, are identified in program or facility requirements documents, and project environmental checklists.

MCP-3480 Environmental Instructions for Facilities, Processes, Materials and Equipment -- The purpose of this management control procedure (MCP) is to provide instructions for performing environmental planning, compliance, and protection activities during the course of conducting work. These instructions should be used in conjunction with other appropriate instructions (for example, operating, maintenance, construction, safety and health), as well as environmental permits. This is the key document that takes environmental instructions to the work force.