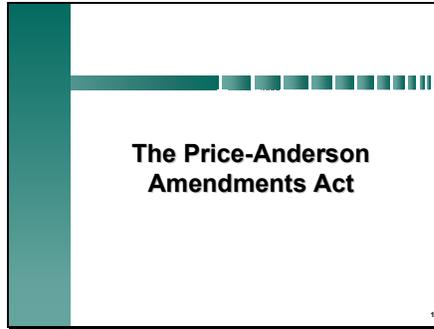
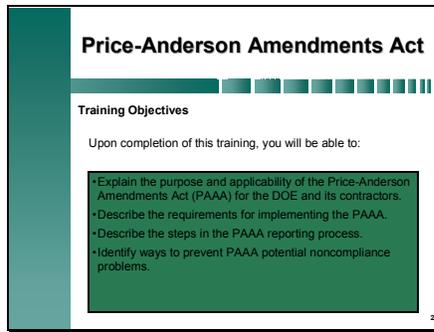


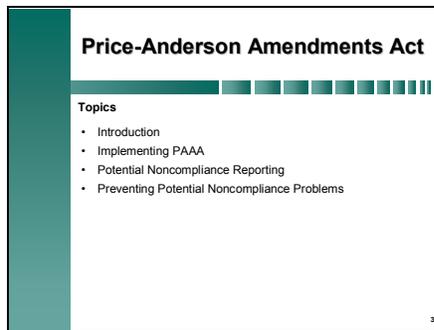
Slide 1



Slide 2



Slide 3



Slide 7

Price-Anderson Amendments Act

Applicability

- PAAA applies to contractors, subcontractors, and suppliers conducting activities that affect or may affect the safety of DOE nuclear facilities or activities.
- All work must be accomplished with established quality and Nuclear Safety requirements set out in the contracts.



7

Slide 8

Price-Anderson Amendments Act

Applicability (continued)

- Nuclear facilities* and activities (includes radiological)
- Work in support of those facilities and activities

* Any where work is carved out in support of nuclear activities



8

Slide 9

Price-Anderson Amendments Act

Applicability (continued)

- Activities that can cause or contribute to nuclear or radiological incidents, or could result in potential for radiological harm
- A nuclear facility does not necessarily mean a building, a room, or structure. It is any where work is carried out that involves nuclear material or components.



9

Slide 10

Price-Anderson Amendments Act

Underlying Principles

- Compliance and safety is a contractor responsibility.
- Participation in the self-reporting process is voluntary and through contractor initiative.
- The American public expects that work carried out on their behalf will be done correctly and safely.
- By establishing strong quality and Nuclear Safety programs everyone benefits!



10

Slide 11

Price-Anderson Amendments Act

Contractor Responsibilities

- Understand and implement nuclear safety requirements
- Critically self-assess activities
- Promptly identify, report, and correct noncompliances
- Conduct work activities in compliance with applicable procedures
- Assure the subcontractors performance meets requirements



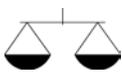
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Slide 12

Price-Anderson Amendments Act

How It Works

- The DOE PAAA Program
 - Provides positive incentives for prompt identification, reporting and comprehensive corrective action
 - Establishes a series of enforcement tools including Notices of Violation and civil penalties for violations



12

Slide 13

Price-Anderson Amendments Act

How It Works

- Implementation is through in-place programs and processes
 - Quality Assurance (QA)
 - Integrated Safety Management (ISM) programs
 - Radcon Program
 - Safety Basis Requirements
 - These requirements are derived from pre-existing DOE Orders



13

Slide 14

Price-Anderson Amendments Act

Check Your Understanding

- What is the purpose of DOE's PAAA Program?
- What are DOE's responsibilities under the PAAA?
- To what kind of work does the PAAA apply?
- To whom does the PAAA apply?
- What are the contractor's responsibilities under the PAAA?



14

Slide 15

Price-Anderson Amendments Act

How Did You Do?

- PAAA's purpose is to promote the protection of the environment, health, and safety of the public and workers.
- DOE's PAAA responsibilities are to
 - Indemnify DOE contractors against public liability due to a nuclear incident
 - Establish nuclear safety requirements
 - Provide DOE enforcement authority

15

Slide 25

Price-Anderson Amendments Act

Potential Noncompliance

- Primary responsibility for identifying and correcting potential noncompliances belongs to DOE's
 - Contractors
 - Subcontractors
 - Suppliers

Contractors are responsible for the PAAA actions of their subcontractors and suppliers



25

Slide 26

Price-Anderson Amendments Act

Potential Noncompliance

- Sources for identification include
 - Worker Identified
 - Internal and External Assessments
 - Event-Related
 - Safety System Degradation



26

Slide 27

Price-Anderson Amendments Act

Check Your Understanding

- Who has primary responsibility for implementing and assuring compliance with the PAAA?
- What is a noncompliance?
- Who has primary responsibility for identifying and correcting potential noncompliances?
- Name four sources for identifying noncompliances.



27

Slide 31

Price-Anderson Amendments Act

Potential Noncompliance Reporting

- Cooperation builds trust and commitment by both DOE and its contractors.
- Under PAAA the Office of Enforcement is given the authority to mitigate fines if there is full early disclosure



31

Slide 32

Price-Anderson Amendments Act

Potential Noncompliance Reporting

- DOE expects contractors to
 - Identify noncompliances in a timely manner
 - Promptly and thoroughly report noncompliances
 - Identify the causes
 - Work to prevent recurrence as part of correcting the noncompliance



32

Slide 33

Price-Anderson Amendments Act

Potential Noncompliance Reporting

- DOE enforcement actions and penalties depend on
 - Safety significance
 - Contractor initiative in identification and reporting
 - Timeliness and effectiveness of corrective actions



33

Slide 37

Price-Anderson Amendments Act

NTS Reporting

- *Unusual Occurrences* can be related to
 - Facility Condition
 - Environmental
 - Personnel
 - Radiological Protection
- Certain levels of personnel contamination and radiation exposure should be considered for NTS reporting



Slide 38

Price-Anderson Amendments Act

Local Reporting

- Locally reportable
 - Any noncompliance that does not meet the reporting criteria for NTS
 - Should be identified as PAAA applicable and be readily accessible
 - All locally reportable noncompliances should be reviewed periodically for potential programmatic issues



Slide 39

Price-Anderson Amendments Act

Check Your Understanding

- What are DOE's expectations for noncompliance reporting and correction?
- What are the factors that influence DOE decisions about enforcement actions?
- What are the two ways of reporting potential noncompliances?



Slide 40

Price-Anderson Amendments Act

How Did You Do?

- DOE expects contractors to
 - Identify noncompliances in a timely manner
 - Promptly and thoroughly report noncompliances
 - Identify the causes
 - Work to prevent recurrence as part of correcting the noncompliance
- DOE enforcement actions and penalties depend on
 - Safety significance
 - Contractor initiative in identification and reporting
 - Timeliness and effectiveness of corrective actions
- Potential noncompliances are reported to the DOE (Noncompliance Tracking System) and locally

40

Slide 41

Price-Anderson Amendments Act

Preventing Price-Anderson Noncompliance Problems

- Contractor employees can keep their company in compliance by
 - Understanding and implementing nuclear safety requirements
 - Critically self-assessing activities
 - Promptly identifying, reporting, and correcting potential noncompliances
 - Conducting work activities in compliance with applicable procedures



41

Slide 42

Price-Anderson Amendments Act

Preventing Price-Anderson Noncompliance Problems

- Examples
 - Following applicable procedures for
 - > Work planning and control
 - > Radiological posting
 - > Procuring safety related items
 - Reporting potential nuclear safety deficiencies to a supervisor or PAAA Program Manager



42

Slide 43

Price-Anderson Amendments Act

Check Your Understanding

- Name four ways to help prevent potential noncompliance problems.
- To whom should a potential nuclear safety deficiency be reported?



43

Slide 44

Price-Anderson Amendments Act

How Did You Do?

- Contractor employees can keep their company in compliance by
 - Understanding and implementing nuclear safety requirements
 - Critically self-assessing activities
 - Promptly identifying, reporting, and correcting potential noncompliances
 - Conducting work activities in compliance with applicable procedures
- Potential nuclear safety deficiencies should be reported to a supervisor or PAAA Program Manager

44

Slide 45

Price-Anderson Amendments Act

For Further Information on PAAA you may go to the following web sites:

- The Office of Enforcement
<http://tis-nt.eh.doe.gov/enforce>
- QSM SIG Site for the PAAA Training is
<http://www.orau.gov/gsm/QSMproducts.htm>
- The EFCOG Site for the PAAA Working Group is
<http://www.efcog.org/workgroups/paaa/index.htm>

45

Slide 46

Price-Anderson Amendments Act

Course Summary

- The purpose of the PAAA is to enhance nuclear safety.
- The Price-Anderson program is good business.
- The United States Government will indemnify its contractors.
- If contractors do not perform nuclear or radiological work correctly, they are subject to penalties.
- It benefits the contractors to maintain good work practices which will produce quality products and services.



46
