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United States Government **Department of Energy**

memorandum

DATE: OCT 21 1994

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ENVIRONMENTAL PROTECTION DIVISIO
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REPLY TO ATTN OF: Office of NEPA Oversight:Osborne:202-586-4596

SUBJECT: Delegation of Environmental Assessment Approval Authority

TO: Joe La Grone
Manager, Oak Ridge Operations Office

This is in response to your September 28, 1994, request (which we received on October 4, 1994) for approval authority for environmental assessments under the provisions of Section I.A. of the Secretarial Policy Statement on the National Environmental Policy Act (NEPA), issued June 13, 1994. Based on your confirmation that you have designated a NEPA Compliance Officer, have prepared internal scoping procedures and public participation and quality assurance plans, and have adequate Department of Energy legal resources, I hereby delegate the requested authority to you, effective immediately. Please note that Department of Energy counsel must concur in the legal adequacy of NEPA documents before they are approved.

This delegation of environmental assessment approval authority includes the authority to make environmental assessment determinations and to issue environmental assessments, findings of no significant impact (or determinations, based on the assessments, that an environmental impact statement is required), and associated floodplain and wetland action documents. (This delegation also includes authority to make categorical exclusion determinations and approve associated floodplain and wetland action documents.)

The Office of NEPA Oversight monitors activities related to the environmental assessment process as part of its responsibilities to measure the Department's overall compliance with NEPA and to foster continuous improvement under the Secretary's policy. That Office needs your assistance to obtain information on the cost and time for environmental assessment preparation, the influence of the environmental assessment process on decision making, and public reaction to the process. The Office of NEPA Oversight also acts as a central repository of Departmental NEPA documents. The attachment describes the information that we need from your organization.

In accordance with the Secretarial Policy Statement on NEPA, you may redelegate environmental assessment approval authority to the Heads of your subsidiary Field Organizations, upon receipt of a request. Heads of subsidiary Field Organizations must confirm that they meet the criteria specified in the Secretarial Policy Statement on NEPA (paragraph I. A. 1), as you confirmed in your request. If you redelegate environmental assessment approval authority, please inform the Heads of the subsidiary Field Organizations of the need for Department of Energy counsel concurrence in the legal adequacy of NEPA documents before they are approved and the need to provide the information in the attachment to the Office of NEPA Oversight. Also, please inform the Office of NEPA Oversight of your redelegation within two weeks. We would like to

discuss further with you, however, how any redelegations would be implemented at Oak Ridge Operations Office.

The Office of NEPA Oversight is available on request from your organization to provide assistance and training and to serve on NEPA document preparation teams. We will support your efforts to make the NEPA process more efficient and useful to decision makers and the public. Please direct any questions to Carol Borgstrom, Director, Office of NEPA Oversight, at 202-586-4600 (fax: 202-586-7031).

for Tara O'Toole, M.D., M.P.H.
Assistant Secretary
Environment, Safety and Health

Attachment

cc: Victor H. Reis, DP-1
Christine Ervin, EE-1
Thomas P. Grumbly, EM-1
Martha A. Krebs, ER-1
Patricia Godley, FE-1
Donald W. Pearman, Jr., FM-1
Robert Nordhaus, GC-1
Terry Lash, NE-1
John G. Keliher, NN-1
Daniel Dreyfus, RW-1
Patricia Phillips, NEPA Compliance Officer, Oak Ridge

ATTACHMENT

INFORMATION TO BE PROVIDED TO THE OFFICE OF NEPA OVERSIGHT RELATED TO THE ENVIRONMENTAL ASSESSMENT PROCESS

The Office of NEPA Oversight monitors activities related to the environmental assessment process as part of its responsibilities to measure the Department's overall compliance with NEPA and to foster continuous improvement under the Secretary's policy. The Office also acts as a central repository of Departmental NEPA documents.

Please provide the following information or materials to that Office within two weeks of their availability.

- Your determination to prepare an environmental assessment (or a courtesy copy of a letter informing States, Indian tribes, and/or the public of that determination). (Note that such notification to the Office of NEPA Oversight has been required under DOE 5440.1E.) Upon receipt of your determination, the Office of NEPA Oversight will assign a Department of Energy environmental assessment number.

- The name of the NEPA Document Manager.

- Courtesy copies of letters transmitting an environmental assessment to States, Indian tribes, and, when applicable, members of the public for preapproval review. (This continues an existing practice.)

- Copies of an approved environmental assessment and any finding of no significant impact (five hard copies and one electronic file); if the environmental assessment does not support a finding of no significant impact, courtesy copy of the determination that an environmental impact statement is required. (The Office of NEPA Oversight will continue to place copies of approved environmental assessments and findings of no significant impact in its archives and distribute them to the Office of Scientific and Technical Information and the Forrestal Reading Room.)

- When appropriate, a copy of any proposed finding of no significant impact (40 CFR 1501.4(e)(2)).

At the completion of each environmental assessment process, the NEPA Document Manager, your NEPA Compliance Officer, and the team that prepared the document should complete NEPA Lessons Learned Questionnaires as soon as possible and forward the completed forms to the Office of NEPA Oversight. The Office of NEPA Oversight provided an Interim/Draft Lessons Learned Questionnaire to your NEPA Compliance Officer by memorandum on August 12, 1994.

United States Government

Department of Energy

Oak Ridge Operations Office

memorandum

DATE: November 23, 1994

REPLY TO ATTN OF: SE-311:Phillips

SUBJECT: **REQUEST FOR DELEGATION OF AUTHORITY FOR CATEGORICAL EXCLUSION DETERMINATIONS AND FLOODPLAIN WETLAND DOCUMENTATION APPROVAL**

TO: Joe La Grone, M-1

This is a request for delegation of full authority for categorical exclusion (CX) determinations and approval of floodplain and wetland action documentation for all Oak Ridge Operations Office (ORO) actions. CX determinations are only for those actions that fall within the typical classes of actions as listed in Appendices A and B to Subpart D of the DOE NEPA regulations. This request is made pursuant to the Secretary's Policy Statement dated June 13, 1994, regarding the National Environmental Policy Act (NEPA) that included provisions for delegation of authority to Heads of Subsidiary Field Organizations.

The Policy Statement requires that before receiving delegated authority, Subsidiary Field Organizations must confirm that a NEPA Compliance Officer has been designated, adequate DOE legal resources are available, internal scoping procedures, and public participation and quality assurance plans have been prepared for ORO. I confirm that my office meets all the necessary conditions to receive delegation of authority. The ORO NEPA Compliance Officer and the Office of Chief Counsel will continue to review and concur on all CX determinations and floodplain and wetland documentation.

I believe this delegation will further streamline the ORO NEPA process while maintaining its integrity.

Robert W. Poe
Assistant Manager
for Environment, Safety, and Quality

I hereby delegate authority to you for categorical exclusion determinations and floodplain and wetland documentation approval:

Joe La Grone, Manager

11/21/94
Date

FLOODPLAIN AND WETLAND DOCUMENTATION AT ORO

TO COMPLY WITH 10 CFR 1022

	Floodplain	Wetland
Notice of Involvement	Approved by AMESQ Published in Federal Register	Approved by AMESQ Published in Federal Register
Assessment	Accompanies Statement of Findings Include in EA or CERCLA Document	Attach to CX or Included in EA or CERCLA document
Statement of Findings	Approved by AMESQ Published in Federal Register Either Separately or in FONSI	Not Required by 10 CFR 1022

FLOODPLAIN AND WETLAND DOCUMENTATION AT ORO

TO COMPLY WITH 10 CFR 1022

(SUBMITTAL PACKAGES)

	Floodplain	Wetland
Notice of Involvement	Poe to Rosen Memo Notice of Involvement	Poe to Rosen Memo Notice of Involvement
Assessment	Included in EA or CERCLA Document Package Include with Statement of Findings Package	Attach to CX Package or Include in EA or CERCLA Document Package
Statement of Findings	Poe to Rosen memo Statement of Findings Floodplain Assessment Attached	Not Required by 10 CFR 1022

cc: OR NCO, Program NCO

Concurrence Chain: OR NCO, CC, Program AM, AMESQ

Rita Rosen, Federal Register Liaison, HR-622, 4B-244/FORS

U.S. DEPARTMENT OF ENERGY OAK RIDGE OPERATIONS OFFICE	Procedure No. 2015 Rev: 0 Effective Date: August 15, 1994
Title: Internal Scoping During the NEPA Process	Supercedes: Procedure No.____ Rev:____

1.0 Purpose

To establish procedures for conducting internal scoping for NEPA documentation, including Environmental Assessments (EAs) and related Findings of No Significant Impact (FONSIs) and Environmental Impact Statements (EISs) for actions under the purview of Oak Ridge Operations (ORO).

2.0 Applicability

This procedure is applicable to ORO personnel and contractors who participate in internal scoping efforts on EAs or EISs for actions that are the responsibility of ORO.

3.0 Responsibilities

3.1 NEPA Compliance Officer (NCO), ORO

Participates in the internal scoping process by reviewing and commenting on documents and related material provided by the NEPA Document Manager and by participation in internal scoping meetings and other forms of communication.

3.2 NEPA Document Manager (NDM), ORO

3.2.1 Manage the preparation, review, and processing of NEPA documentation.

3.2.2 Establish the project team for internal scoping.

3.2.3 Conduct internal scoping.

3.2.4 Document the results of the internal scoping process.

3.3 Chief Counsel, ORO

Participates in the internal scoping process by review and comment on documents and related material provided by the NDM and by participation in internal scoping

and related material provided by the NDM and by participation in internal scoping meetings and other forms of communication.

3.4 Contracting Officer's Representative (COR), ORO

Participates in the internal scoping process by review and comment on documents and related material provided by the NDM and by participation in internal scoping meetings and other forms of communication.

3.5 Contractor

3.5.1 Participates in the internal scoping process by reviewing and commenting on documents and related material provided by the NDM and by participation in intenal scoping meetings and other forms of communication.

3.5.2 When requested by the NDM, prepares and revises NEPA documentation and other material used during the internal scoping process.

4.0 Procedure

4.1 Establish the project team for internal scoping.

The project team for internal scoping is established by the NDM. Members of the project team could include:

contractor project/design engineer;

contractor program manager;

DOE program/project manager;

contractor environmental/NEPA specialist;

DOE field counsel;

ORO NCO or representative designated by NCO;

DOE and/or contractor community/public relations specialist; and

other environmental specialists from DOE or contractor, as appropriate.

Depending on the degree of complexity, the degree of public concern, or the level of technical controversy regarding an action, the NDM may decide to include the DOE-HQ program manager and representatives from EH-25 and GC-51 on the project team.

4.2 Conduct Internal Scoping

Internal scoping is intended to be an informal exchange of information to ensure the best product and a common understanding of the task. The goal is to improve the quality of first drafts of DOE EAs and EISs. Internal scoping should occur early in the process, typically starting immediately after the approval of the EAD. For complex actions, however, the NDM may decide to initiate early internal scoping prior to the EAD. For an EIS, internal scoping should be initiated prior to public scoping.

Internal scoping is initiated by the NDM after the project team has been selected. Internal scoping may occur in one or a few meetings, depending on the action, or through an exchange of memoranda if the action is straightforward.

The purpose of internal scoping for the EA is to establish the project team that will guide the preparation of the EA and to determine issues and alternatives that need to be evaluated and the depth of analysis required. The purpose of internal scoping for an EIS is to identify the preliminary issues related to the action and to establish the project team which will guide the preparation of the EIS.

The NDM should provide the project team members with the following at or prior to the first internal scoping meeting:

- preliminary draft material on the purpose and need for the action;
- preliminary draft material on a description of the action; and
- identification and summary material on other ongoing NEPA reviews related to the action.

The number and format of the internal scoping meetings is determined by the complexity of the action and the degree of public concern. The internal scoping process for an EA is considered complete when the project team reaches a consensus on the issues, alternatives, and depth of analysis, and decides on the level of public participation. The internal scoping process for an EIS is considered complete when the project team has identified the

preliminary issues related to the action.

4.3 Document the Results of the Internal Scoping Process

At the conclusion of the internal scoping process for an EA, the NDM will provide the following to the EA writing team:

scope of action, including
purpose and need
description
list of alternatives to be evaluated
guidance on the depth of analysis to be pursued
list of other NEPA analyses from which to tier or reference
proposed schedule
proposed public participation plan

5.0 Records

The NDM will maintain the documentation of the internal scoping process. This documentation may be physically located with the NEPA contractor. At a minimum, this documentation includes the material provided to the project team members and to the writing team members.

6.0 Training

Training for this procedure should include required reading and understanding of this procedure, as well as additional NEPA training or experience with the NEPA process. All training should be documented and records maintained by the appropriate Training Coordinator.

DOE/OR-2014

PUBLIC PARTICIPATION PLAN FOR ENVIRONMENTAL ASSESSMENTS UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT

AUGUST 9, 1994

U.S. DEPARTMENT OF ENERGY
OAK RIDGE OPERATIONS OFFICE

Public Participation Plan
for Environmental Assessments under
the National Environmental Policy Act

Under the National Environmental Policy Act (NEPA) specific requirements for public involvement in the Environmental Assessment (EA) process are minimal. While specific requirements are minimal the basic charter of NEPA is directed at full public disclosure and is to encourage public participation. To meet the spirit of NEPA, as well as the Secretarial Policy Statement on NEPA, additional options for public involvement are worth considering during the EA process. The requirements and options normally considered are listed below. Additional options which Oak Ridge Operations will consider as the process is underway is listed also. This list will be used to review where public involvement opportunities will enhance the spirit of the NEPA process.

Because public participation policy is based on a variety of public needs and interests, flexibility in public involvement planning is important. A "sliding scale" approach will be used to match plans for actions with needs. Considerations under this approach include seriousness of concerns or impacts; community interest, and EA complexity.

Public involvement **requirements** for an **EA/Finding of No Significant Impact (FONSI)** are:

- Public notice of the intent to prepare an EA
- Preapproval review by interested parties (concurrent with state/tribal review), on request
- Public notice of availability of approved EA/FONSI
- Make available copies of EAs/FONSIs, usually in DOE public reading rooms
- If required by 40 CFR 1501.4(e)(2) or if otherwise beneficial, issue a proposed FONSI for public review and comment (30 day comment period) before making a final determination
- Classified, confidential, or other information that otherwise would not be disclosed pursuant to the Freedom of Information Act will not be divulged

Public involvement **options** for an **EA** include:

- Public meeting (scoping)
- 30 day comment period for draft EA
- Fact sheet may be provided for public hearing
- Information repository as a way to provide public access to EA

Options to Consider throughout the NEPA Process

Any or all of these elements may be combined as desired during each phase of the EA or throughout the entire NEPA process. *This is a list of options, with no intent to rank. Each of these should be carefully considered for strengths and weaknesses during the EA planning.* Objectives for this planning should seek to understand and meet community needs for information, provide opportunities that match those needs, and include an evaluation on the

effectiveness of their use. Should conflicts exist, planning should seek to resolve those conflicts. Although community differences would very, examples of *options to consider include*:

Purpose:

- To establish a process for public involvement that receives early response to the EA from interested and potentially affected stakeholders.
- To discover stakeholder acceptability of the EA and its components.
- To prevent late discovery of opposition or difficulties arising from lack of stakeholder acceptability.
- To identify whether a group of interested stakeholders exists who have ongoing needs or choose intermittent involvement throughout this planning process and establish appropriate methods to meet their needs.

Audiences:

Local citizens of Oak Ridge and surrounding communities (including downstream locations and Knoxville), and where applicable regional or national audiences, including:

Media (Newspapers, television, radio)

Government Officials (national - Congress, state - Governor's office and legislative, local - mayor's offices, city councils, county executives, planning commissions, and their advisors or representatives, such as; Environmental Quality Advisory Board (EQAB) & Roane County equivalent, Local Oversight Committee)

Business Leaders [Chamber(s) of Commerce, Board of Realtors, professional organizations, technical societies]

Government agencies (DOE-ORO & -HQ, Environmental Protection Agency (EPA), Tennessee Department of Environmental and Conservation (TDEC), Corps of Engineers, Tennessee Emergency Management Agency (TEMA), U.S. Fish and Wildlife, State Historic Preservation Office)

Special interest groups

Stakeholders Mailing List (Environmental & activist groups, labor, etc.)

Site Specific Advisory Board (SSAB)

Citizens Working Groups, as applicable

Civic groups

Schools

Scarboro community, or other adjacent communities

East Fork Poplar Creek Property Owners

Employees (DOE, MMES, SAIC and other contractors)

Retirees

Methods and Tools

Methods and tools that will be used to reach these audiences:

Media Relations

Speakers Bureau

Public Workshops

Tours

Videos

Fact Sheets

Environmental Update

Advertisements
Employee Communications
Citizens Working Group
Property Owners Communications/Workshops
Public Meeting(s)
SSAB

An in-depth explanation of these methods and tools follows:

Media Relations

Media List: The Oak Ridger
Knoxville News-Sentinel
Kingston Standard
Roane County News
Clinton Courier
Rhea County Reporter
Farragut Times
Lenoir City
Metro Pulse
WATE-TV6
WKXT-TV8
WBIR-TV10
Cable Access Channels (Channel 12-Oak Ridge, Green TV-Knoxville)
WUOT
WIVK*
WMYU*

Federal Register - for national actions

*Send releases about public participation opportunities only

(1) Set up interviews between area media and designated EA project team members to discuss: history and what's been done to date, including the NEPA process; potential alternatives, including their anticipated impacts on the environment and the community; property owners issues; and opportunities for public involvement and further information resources.

- Media training can be provided as part of the communications training outlined in the *Speakers Bureau* section below.

(2) Explore the possibility of writing an article to be published in area papers. These would feature the topics mentioned in (1).

(3) Keep media informed of all public workshops, tours, meetings and other important information related to the EA.

Speakers Bureau

(1) Create an EA Speakers' Bureau consisting of key people involved in the project (a Speakers Bureau already exists).

- Provide communications and media training and other support

(2) Create a presentation for these individuals to use that succinctly summarizes the history, status of the project and potential alternatives and their anticipated effects on the environment and the community. Several copies could be generated to be "checked out" by presenters. (If video exists, it can also be used as part of presentation.)

(3) Utilize the list of professional groups and civic organizations within the existing ERWM Speakers Bureau program, including:

Possible Groups:
- Chamber(s) of Commerce
- Board of Realtors
- Builders Association
- League of Women Voters
- Professional Societies
- Technical Societies
- Rotary Clubs
- Lions Clubs
- EQAB (Oak Ridge and Roane County)
- Site Specific Advisory Board (SSAB)
- Stakeholders
- Country Club
- Sportsman's Club
- City Council meetings (and committees - Planning Commissions)
- County Govt. meetings
- Local Oversight Committee
- PTAs/PTOs
- Interagency Task Force
- Meetings at MMES, and other contractor sites
- YWCA
- Project Management Institute
- American Legions
- VFWs
- Senior Citizen Centers
- Roane-Anderson Economic Development
- Roane County Environmental Advisory Group

(4) Develop a questionnaire/feedback form to use whenever a speaker makes a presentation.

Public Workshops

(1) Advertise public workshops in local media outlets, Environmental Update, and in-house publications.

(2) Based on demand, develop a workshop for individuals interested in learning more about the EA. These could be either half-day Saturday sessions or 2-hour sessions during the week.

- Provide support and training to presenters

(3) Hold workshops as needed and videotape one of these for future use; make tape available for community television.

Tours

(1) If applicable, develop a tour for the EA. (Tour program already exists.)

(2) Develop supporting material (general material may already exist).

(3) Advertise availability of tours in local media outlets.

Video

(1) Develop a general video that explains the entire NEPA process.

(2) Develop a project specific video that explains the proposed action.

Fact Sheets

(1) Create or update NEPA or EA fact sheets as needed and place in prominent locations.

(2) Prepare a general fact sheet on related topics.

Environmental Update

(1) If an EA is related to Environmental Restoration and Waste Management activities, an article should appear in each issue of Update to bring readers attention to the project.

Oak Ridge Reservation Environmental Report

(1) Information concerning EAs prepared for the Oak Ridge Reservation should be included in the *Oak Ridge Reservation Environmental Report* for the calendar year of preparation.

Advertisements

Ads will be placed in local papers announcing the availability of information, speakers, tours, videos, fact sheets, and public participation/comment opportunities on a regular basis.

Employee Communications

Steps may be taken to inform DOE and contractor employees of the EA.

Tools to accomplish this include:

Articles in: local DOE in-house publication
MMES in-house publications
SAIC in-house publication
Jacobs in-house publication

Distribute Environmental Update to DOE/contractor employees

Provide EA presentations at DOE/contractor employee meetings

Citizens' Working Group or Focus Groups

If an EA stimulates adequate interest, a citizens working group could be formed. A focus group can serve on a short term basis to survey citizens' opinions or concerns.

Property Owners Communications

Affected property owners will be informed as early as possible of the project status and any changes throughout project.

Tools to accomplish this include:

Letters from EA project manger
Notifications of public participation/comment opportunities
Special presentations/workshops
Make video available
Mail special issue of Update

Public Meeting

Public meetings will be held to meet the community's needs for this project.

Measurements

(1) Develop a survey/feedback form to use that will measure effectiveness of communications efforts. Make this available at presentations, with video, at public workshops/meetings, etc.

(2) Use Innovator (an anonymous group feedback technology) where appropriate.

DOE/OR-2008

QUALITY ASSURANCE PLAN FOR THE NATIONAL ENVIRONMENTAL POLICY ACT PROCESS

AUGUST 26, 1994

U.S. Department of Energy
Oak Ridge Operations Office

TABLE OF CONTENTS

	Page
LIST OF ACRONYMS	iii
1.0 INTRODUCTION	1
2.0 SCOPE	1
3.0 REFERENCES	1
4.0 ORGANIZATIONAL ROLES AND RESPONSIBILITIES	2
5.0 APPROVAL OF CONTRACTOR'S QUALITY ASSURANCE PLAN	2
6.0 PREPARATION AND REVIEW OF NEPA DOCUMENTATION	2
6.1 ESTABLISHING THE LEVEL OF NEPA REVIEW	2
6.2 CATEGORICAL EXCLUSION PROCESS	3
6.3 ENVIRONMENTAL ASSESSMENT/FINDING OF NO SIGNIFICANT IMPACT PROCESS	3
6.4 ENVIRONMENTAL IMPACT STATEMENT/EIS IMPLEMENTATION PLAN/EIS RECORD OF DECISION PROCESS	3
7.0 ASSESSMENT OF ORO NEPA PROCESS	3
7.1 ASSESSMENT PROCEDURE	3
7.2 ADDITIONAL GUIDANCE	3
ATTACHMENT 1 ORO DOCUMENT HIERARCHY FOR THE NEPA PROCESS	1-1
ATTACHMENT 2 ORO RESPONSIBILITIES	2-1
ATTACHMENT 3 SAMPLE CONTRACTOR NEPA QUALITY ASSURANCE PLAN	3-1

LIST OF ACRONYMS

CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
COR	Contracting Officer's Representative
CX	Categorical Exclusion
DOE	U.S. Department of Energy
EA	Environmental Assessment
EH-25	Office of NEPA Oversight
EIS	Environmental Impact Statement
FONSI	Finding Of No Significant Impact
NCO	NEPA Compliance Officer
NEPA	National Environmental Policy Act of 1969
NOI	Notice Of Intent
ORIG	Oak Ridge Implementation Guidance
ORO	Oak Ridge Operations Office (DOE)
QAP	Quality Assurance Plan
ROD	Record Of Decision

1.0 INTRODUCTION

This Quality Assurance Plan (QAP) will provide additional confidence that the U.S. Department of Energy (DOE) proposed actions executed by the Oak Ridge Operations Office (ORO) are completed in accordance with DOE's policy to follow the letter and spirit of the National Environmental Policy Act (NEPA). The QAP will address the Council on Environmental Quality (CEQ) Regulations and ensure the NEPA review process is applied early in the planning stages for DOE proposals.

This QAP defines policy, responsibilities, and requirements, and provides guidance for using DOE NEPA Implementing Procedures (10 CFR 1021). ***Attachment 1*** is the ORO document hierarchy for the review of NEPA documentation at ORO. ***Attachment 2*** provides a matrix of ORO responsibilities. ***Attachment 3*** gives an example of a contractor QAP.

2.0 SCOPE

The scope of this plan encompasses the preparation, review, approval, and issuance of NEPA documentation at ORO including:

- Categorical Exclusion (CX)
- Environmental Assessment (EA)
- Finding Of No Significant Impact (FONSI)
- Notice Of Intent (NOI)
- Environmental Impact Statement (EIS)
- Record Of Decision (ROD)
- Any other document prepared pursuant to NEPA or the CEQ regulations

3.0 REFERENCES

1. National Environmental Policy Act of 1969 (42 U.S. Code 4321 et seq.)
2. 40 Code of Federal Regulations (CFR) 1500-1508, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act"
3. 10 CFR 1021, "NEPA Implementing Procedures"
4. DOE Order 5440.1E, "National Environmental Policy Act Compliance Program"
5. Oak Ridge Implementation Guidance (ORIG) N 5440.1C, "National Environmental Policy Act Compliance Program"

6. DOE "Secretarial Policy Statement on the National Environmental Policy Act," June 1994.

7. DOE Order 5700.6C, "Quality Assurance"

8. ORIG 5700.6D, "Quality Assurance"

9. DOE Order 5482.1B, "Environment, Safety and Health Appraisal Program"

10. ORIG 5482.1D, "Environment, Safety, Health and Quality Assurance Appraisal Program"

11. DOE-HQ, Office of NEPA Oversight (EH-25) Paper, "Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements," May 1993.

4.0 ORGANIZATIONAL ROLES AND RESPONSIBILITIES

Organizational roles and responsibilities for compliance with NEPA, in accordance with the requirements of DOE Order 5440.1E, are provided in paragraphs 6 and 7 of ORIG 5440.1C. Organizational roles and responsibilities are further defined in the DOE "Secretarial Policy Statement on the National Environmental Policy Act," June 1994. Two matrices of these organizational roles and responsibilities, keyed to the respective DOE Order, ORIG, and the Secretarial Policy Statement requirements, are provided in ***Attachment 2***.

Organizational roles and responsibilities for the implementation of quality assurance criteria, in accordance with the requirements of DOE Order 5700.6C, are provided in paragraphs 6 and 7 of ORIG 5700.6D and in the ORIG Attachment 1, "ORO Management, Performance and Assessment Program."

5.0 APPROVAL OF CONTRACTOR'S QUALITY ASSURANCE PLAN

At the discretion of the cognizant Contracting Officer's Representative (COR) or Project Manager, contractors may be required to develop QAPs that comply with NEPA and QA requirements cited in Section 3.0, "References." If a contractor NEPA QAP is required, the cognizant COR or Project Manager shall, in coordination with the Quality and Reliability Division and the Environmental Protection Division, review and approve the contractor's QAP to ensure that the contractor's plan adequately complies with these requirements.

A sample NEPA QAP can be found in ***Attachment 3*** and is designed to be used as an outline for the preparation of an ORO contractor NEPA QAP.

6.0 PREPARATION AND REVIEW OF NEPA DOCUMENTATION

6.1 ESTABLISHING THE LEVEL OF NEPA REVIEW

The method for determining the level of NEPA review required when the NEPA process begins shall be in accordance with the requirements of DOE Order 5440.1E and is provided in ORIG 5440.1C, Appendix A, "Establishing the Level of National Environmental Policy Act (NEPA) Review."

6.2 CATEGORICAL EXCLUSION PROCESS

The process for preparation, review, approval, and issuance of CXs shall be in accordance with the requirements of DOE Order 5440.1E, and is provided in ORIG 5440.1C, Appendix B, "Categorical Exclusion (CX) Process."

6.3 ENVIRONMENTAL ASSESSMENT/FINDING OF NO SIGNIFICANT IMPACT PROCESS

The process for preparation, review, approval, and issuance of EAs and FONSIs shall be in accordance with the requirements of DOE Order 5440.1E, and is provided in ORIG 5440.1C, Appendix C, "Environmental Assessment (EA) Process."

EAs do not always result in FONSIs, and may lead to the determination that preparation of an EIS is necessary, as addressed in Section 6.4.

6.4 ENVIRONMENTAL IMPACT STATEMENT/EIS IMPLEMENTATION PLAN/EIS RECORD OF DECISION PROCESS

The process for preparation, review, approval, and issuance of EISs and associated documents, shall be in accordance with the requirements of DOE Order 5440.1E, and is provided in ORIG 5440.1C, Appendix D, "Environmental Impact Statement (EIS) Process."

7.0 ASSESSMENT OF ORO NEPA PROCESS

7.1 ASSESSMENT PROCEDURE

The procedure for assessing the contractor's NEPA process, including the preparation, review, approval, and issuance of NEPA documentation, shall be in accordance with the requirements of DOE Order 5482.1B, and is provided in ORIG 5482.1D.

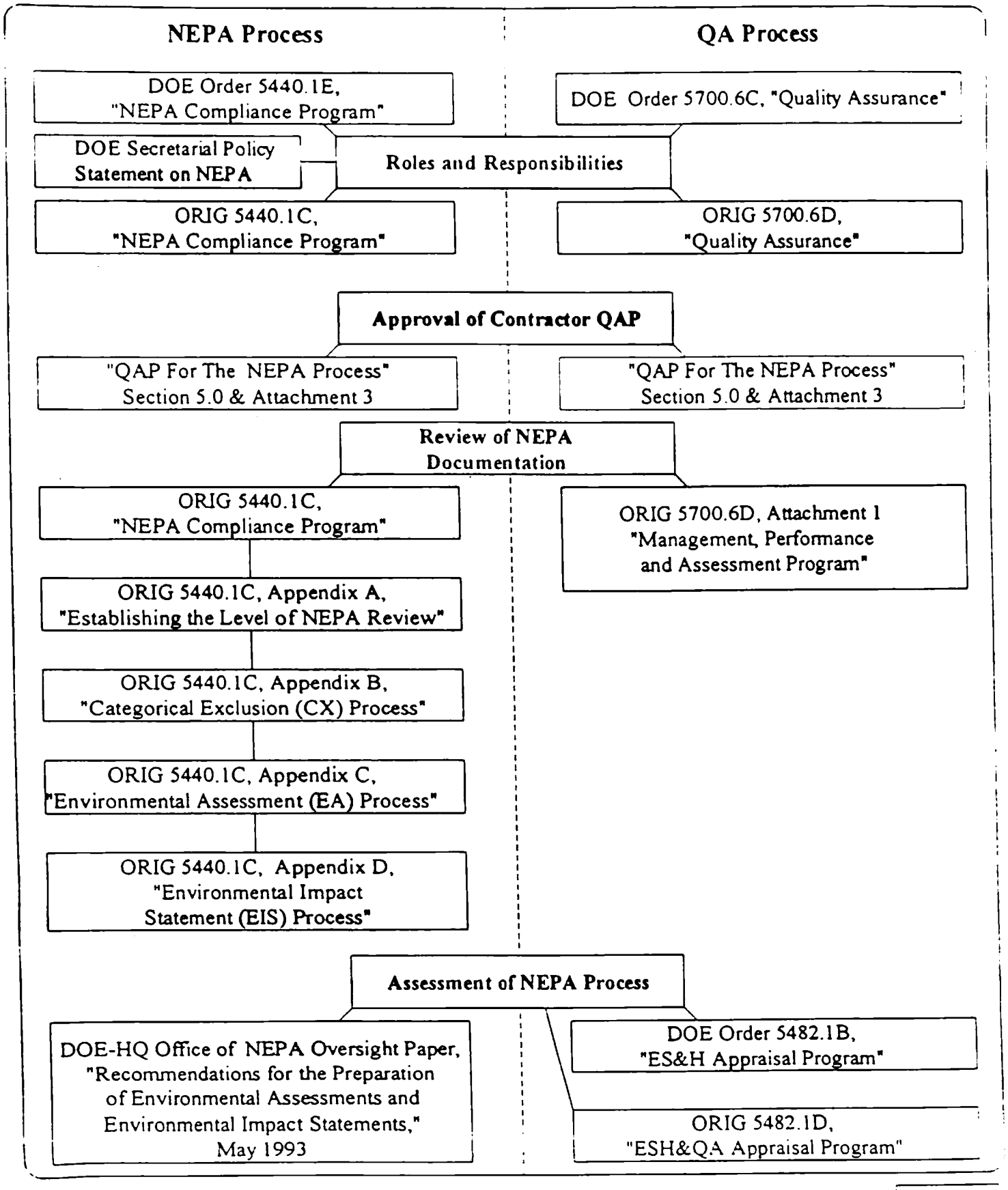
7.2 ADDITIONAL GUIDANCE

The Office of NEPA Oversight paper (Reference 11) provides additional guidance and recommendations that should materially aid those responsible for preparation and review of NEPA documents in focusing on significant environmental issues, adequately analyzing environmental impacts, and effectively presenting the analysis to decision makers and the public.

ATTACHMENT 1

ORO DOCUMENT HIERARCHY FOR THE NEPA PROCESS

Attachment 1
ORO Document Hierarchy For NEPA Process



ATTACHMENT 2

ORO RESPONSIBILITIES

MATRIX OF ORO ROLES AND RESPONSIBILITIES AS DEFINED IN DOE ORDER 5440.1E AND ORIG 5440.1C

	DOE ORDER AND ORIG PARAGRAPH NUMBERS*																		
DOE ORDER 5440.1E	6.b (1)	6.b (2)	6.b (3)	6.b (4)	6.b (5)	6.b (6)	6.b (7)	6.b (8)	6.b (9)	6.b (10)	6.c (1)	6.c (2)	6.c (3)	6.c (4)	6.c (5)	6.c (6)	6.c (7)		
ORIG 5440.1C	6.a (1)	6.a (1)	6.h (1)	6.c (1)	6.h (2)	6.a (2) 6.b	6.a	6.a	6.h (3) 6.f	6.h (4) 6.a (1)	6.c (1)	6.c (1)	6.c (1)	6.h (5) 6.a (1)	6.c (1)	6.c (1)	6.c (1)	6.d	
ORO FUNCTION	ORO ROLES AND RESPONSIBILITIES																		
ORO Manager	X	X																	
CORs			X		X				X	X				X					
NCO				X		X				X	X	X	X	X	X	X	X		
AMA						X													
Director, P&CD							X	X											
Director, P&BD									X										
Director, EPD																		X	
Office of Chief Counsel																			X

*See Page 2-2—2-5 for paragraph description key

LEGEND:

AMA - Assistant Manager for Administration
COR - Contracting Officer's Representative
EPD - Environmental Protection Division
NCO - NEPA Compliance Officer
ORO - Oak Ridge Operations
ORIG - Oak Ridge Implementation Guidance
P&CD - Procurement and Contracts Division
P&BD - Planning and Budget Division

Paragraph No.	Description
6.b.	Field Officers are persons responsible for managing a DOE Field Office or similar field organization, who report directly to a Secretarial Officer. For the purpose of DOE Order 5440.1E, the Manager, Oak Ridge Operations Office, is the Field Officer. Each Field Officer shall, for matters under his authority:
6.b.(1)	Determine the appropriate level of NEPA review for those categories of actions specifically listed in subpart D of the DOE NEPA Regulations, if the authority to make such decisions has been delegated from the Secretarial Officer under DOE Order 5440.1E, 6a(10), p. 6. This authority may not be redelegated. If more than one Program Office is responsible for an action, the Field Officer must have received a delegation from all responsible Secretarial Officers in order to make a determination for that action. Within 2 weeks, the Field Officer shall provide a copy of such determination to the Office of NEPA Oversight (EH-25) and the responsible Secretarial Officer, except for the CXs for which documentation is not required [DOE Order 5440.1E, 6d(13)].
6.b.(2)	Designate a NEPA Compliance Officer (NCO) for the field organization and maintain this position to ensure that the requisite functions are carried out (DOE Order 5440.1E, 6c, p. 10); inform EH-25 of the designation.
6.b.(3)	Maintain an environmental compliance staff so that a sufficient variety of environmental disciplines is represented to ensure that properly supervised and technically accurate and complete NEPA documents are prepared.
6.b.(4)	Conduct state/tribal notification, either directly or through the Field Officer's NCO, for those actions for which the NEPA authority has been delegated under DOE Order 5440.1E, 6a(10), p. 6.
6.b.(5)	Prepare NEPA documents at the direction and under the supervision of the responsible Secretarial Officer(s), when so designated under DOE Order 5440.1E, 6a(9), p. 6.
6.b.(6)	Approve procedures and record-keeping requirements, in consultation with all relevant Secretarial Officers [DOE Order 5440.1E, 6a(2)], and in consultation with EH-1 to ensure consistency in the agency-wide application of NEPA.
6.b.(7)	Ensure that the environmental information gathering, analysis, and evaluation requirements of the DOE NEPA regulations (10 CFR 1021.216) are carried out when conducting a procurement, awarding financial assistance, or entering into a joint venture. Incorporate, where appropriate, environmental criteria and conditions into a solicitation, and into a resulting contract or financial assistance instrument issued under his/her authority.
6.b.(8)	Ensure that applicants for financial assistance, permits, licenses, exemptions, allocations, or similar actions submit the information necessary for DOE NEPA compliance, and that they otherwise comply with the requirements of the DOE NEPA regulations (10 CFR 1021.215).

Paragraph No.	Description
6.b.(9)	Incorporate NEPA milestones (CX, EA, FONSI, NOI, draft EIS, final EIS, or ROD) into project planning documents within the project management system administered by the Office of Procurement, Assistance, and Program Management through DOE Order 4700.1. Incorporate a NEPA Status Report on existing or planned NEPA compliance activities into internal budget review documents (i.e., project data sheets or activity data sheets) prepared pursuant to DOE Order 5100.3.
6.b.(10)	Establish procedures and act to ensure that NCOs and cognizant EH-25 staff [as assigned under DOE Order 5440.1E, 6e(3), p. 14] are fully informed in a timely manner of all program considerations, new information, and changes that would bear on the accuracy and objectivity of NEPA documents.
6.c.	The NEPA Compliance Officer (NCO) shall, for matters under the authority of his/her program office or field organization:
6.c.(1)	Provide advice regarding NEPA-related matters, including the provisions of the CEQ regulations, the DOE NEPA regulations, the DOE NEPA Compliance Guide, DOE Order 5440.1E, and any other related guidance and requirements; provide assistance regarding procedures and document preparation; provide NEPA training and disseminate NEPA guidance materials and related information.
6.c.(2)	Participate in periodic NEPA training, meetings, and workshops conducted by the Office of NEPA Oversight (EH-25).
6.c.(3)	Recommend, for his/her Field Officer approval [DOE Order 5440.1E, 6a(2) and 6b(6), pp. 5 and 10, respectively], office NEPA procedures and record-keeping requirements, and document the Office's compliance with those procedures and requirements.
6.c.(4)	Recommend to his/her Field Officer for each proposed action the appropriate level of NEPA review, and recommend schedules designed to ensure the early preparation of NEPA documents.
6.c.(5)	Review NEPA documents and other related documents for compliance with the CEQ Regulations, the DOE NEPA Regulations, and other DOE NEPA-related procedures and guidance.
6.c.(6)	Conduct state/tribal notification, if directed to do so by his/her Field Officer [DOE Order 5440.1E, 6a(15) and 6b(4)].
6.c.(7)	Serve as a liaison in the conduct of state/tribal coordination, and provide EH-25 with comments from the state(s) or tribe(s) and the Program Office's proposed resolutions, unless the Secretarial Officer directs another official to carry out this function.

Summary of ORIG 5440.1C Roles and Responsibilities by Paragraph

Paragraph No.	Description
6.a.(1)	Manager, Oak Ridge Operations, performs those tasks identified in subparagraph 6b(1), for which he has been delegated authority, and subparagraph 6b(2) of DOE 5440.1E.
6.b	Assistant Manager for Administration approves procedure and record-keeping requirements as described in subparagraph 6b(6) of DOE 5440.1E.
6.c.	NEPA Compliance Officer:
6.c.(1)	Performs those tasks identified in subparagraphs 6b(4), 6b(10), and 6c of DOE 5440.1E.
6.c.(2)	Consults with the Assistant Secretary for Environment, Safety, and Health and Secretarial Officers concerning NEPA procedures in accordance with subparagraph 6b(6) of DOE 5440.1E.
6.d.	Director, Environmental Protection Division, maintains a staff of qualified and trained subject matter experts in all relevant environmental specialties to carry out the duties of the Division and to provide expert technical and regulatory support to line management. These experts provide multidisciplinary review of NEPA documents when needed, as determined by the NCO.
6.e.	Director, Procurement and Contracts Division, performs those tasks identified in subparagraphs 6b(7) and 6b(8) of DOE 5440.1E.
6.f.	Director, Planning and Budget Division, incorporates a NEPA Status Report on existing or planned NEPA compliance activities into internal budget review documents as identified in 6b(9) of DOE 5440.1E.
6.g.	Office of Chief Counsel reviews and provides comments on NEPA and NEPA-related documents.
6.h.	Contracting Officers' Representatives (CORs):
6.h.(1)	Perform those tasks identified in subparagraph 6b(3) of DOE 5440.1E concerning the maintenance of an environmental compliance staff. If technical assistance is needed by the COR organization, it should seek help from the Environmental Protection Division staff.
6.h.(2)	Perform those tasks identified in subparagraph 6b(5) of DOE 5440.1E.

Paragraph No.	Description
6.h.(3)	Perform those tasks identified in subparagraph 6b(9) of DOE 5440.1E concerning incorporating NEPA milestones into project planning documents.
6.h.(4)	Supply information to the NCO concerning program considerations, new information, and changes that would bear on NEPA documents as identified in 6b(10) of DOE 5440.1E.
6.h.(5)	Provide NEPA determination request documents and schedules for the preparation of NEPA documents to the NCO in accordance with subparagraph 6b(4) of DOE 5440.1E.

MATRIX OF ORO ROLES AND RESPONSIBILITIES
AS DEFINED IN THE
DOE SECRETARIAL POLICY STATEMENT ON THE NATIONAL ENVIRONMENTAL POLICY ACT (JUNE 1994)

Secretarial Policy Statement Paragraph No. (1)	ORO ROLES & RESPONSIBILITIES				
	ORO Manager	NEPA Document Manager	NEPA Compliance Officer	Project Manager	Contracting Officer
I.A	X				
I.A.2	X				
I.C	X				
I.C.1	X				
I.C.2	X				
I.F	X				
II.A	X	X		X(2)	
II.A.1		X		X(2)	
II.A.2		X		X(2)	
II.A.3		X		X(2)	
II.C		X		X(2)	
II.C.1		X		X(2)	
II.C.2		X		X(2)	
II.C.3		X		X(2)	
II.D		X		X(2)	
III.B.1					X
III.B.2		X		X(2)	
IV.B		X		X(2)	
IV.C		X		X(2)	
V.A		X		X(2)	
V.B		X		X(2)	
V.B.1		X		X(2)	
V.B.2		X		X(2)	
VI.B		X	X	X(2)	
VI.E	X				
VI.F	X				

NOTES

(1) See Pages 2-7—2-9 for paragraph description key

(2) When the Project Manager is also designated the NEPA Document Manager he/she will be responsible for these additional activities.

Summary of DOE Secretarial Policy Statement on the National Environmental Policy Act Roles and Responsibilities by Paragraph

Paragraph No.	Description
I.A	To facilitate early integration of the NEPA process with project planning and decision making, reduce document review times, and foster ownership of NEPA documents, the Manager, ORO, will receive full authority for environmental assessments, findings of no significant impact, and associated floodplain and wetland action documentation requirements relating to ORO proposed actions. Under certain conditions, the Manager, ORO, may redelegate these authorities to heads of subsidiary ORO organizations.
I.A.2	The Manager, ORO, should submit a request for delegation as soon as practicable; the Assistant Secretary for Environment, Safety, and Health, will delegate authority within two weeks of receiving a valid request. The Manager, ORO, is required to submit a valid request no later than December 15, 1994, so that the delegation process can be completed by December 31, 1994.
I.C	The Manager, ORO, will submit an annual NEPA planning summary to the Assistant Secretary for Environment, Safety and Health by January 31 of each year and will make the summary available to the public.
I.C.1	The annual NEPA planning summary will describe briefly the status of ongoing NEPA compliance activities and any environmental assessments expected to be required in the next 12 months or environmental impact statements expected to be required in the next 24 months and, if available, the schedule for completion of each NEPA review identified (see Secretarial Policy Statement, Attachment 2).
I.C.2	Every three years starting with the first year, ORO and its subsidiary organizations will include in their annual NEPA planning summary an evaluation of whether site-wide EISs would facilitate future NEPA compliance efforts.
I.F	Where multiple Field Organizations or Program Offices would be involved in a proposed action for which an environmental assessment is to be prepared, the Manager, ORO, should consult with all involved Offices regarding the assignment of responsibility for preparing and approving the environmental assessment. The Assistant Secretary for Environment, Safety and Health will resolve NEPA issues where several Offices are unable to reach agreement.
II.A	The NEPA process should be a team effort. To establish team leadership and ownership of the NEPA process and thereby improve its management, the Manager, ORO, will designate a DOE project team member as the NEPA Document Manager. The NEPA Document Manager will manage the document preparation process and keep it on schedule. (The Project Manager or NCO may serve this function as appropriate; in any case, the NEPA Document Manager should work closely with these other individuals.) Among the responsibilities of the NEPA Document Manager are to:

Paragraph No.	Description
II.A.1	Consider innovative measures to reduce NEPA process time;
II.A.2	Consider requesting variances from DOE NEPA regulations (10 CFR Part 1021) as necessary to meet timing requirements or for other reasons that are permitted under section 1021.343 of the regulations; and
II.A.3	Elevate internal disputes for prompt decision.
II.C	The NEPA Document Manager will conduct an early internal scoping process for the EA or EIS being prepared. The scoping process should involve a team representing all necessary ORO elements. For an EIS, this internal scoping process should precede the public scoping process that begins with publication of a NOI.
II.C.1	The internal scoping process will include the adoption of a proposed schedule for the preparation of the NEPA document and a pubic participation plan tailored to the project in question.
II.C.2	For each EIS, the schedule established during the internal scoping process will, absent extraordinary circumstances, provide for completion of a final EIS within 15 months of the issuance of the NOI.
II.C.3	The NEPA Document Manager will maintain a tracking system to monitor compliance with the schedule. The annual NEPA planning summary will identify NEPA reviews that are behind schedule and the reasons for any delays.
II.D	To eliminate multiple cycles of revisions, the NEPA Document Manager will ensure internal reviews of draft environmental assessments and environmental impact statements will be concurrent, rather than sequential.
III.B.1	Procurement solicitations [submitted by the Contracting Officer] will include an evaluation criterion for the bidder's past performance of comparable assignments. Measures will include any existing evaluations of NEPA support performance.
III.B.2	At the conclusion of the preparation of each EA and EIS, the NEPA Document Manager will evaluate the contractor's performance for timeliness, quality, cost-effectiveness, responsiveness, and application of the Office of Environment, Safety and Health's *Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements*. The evaluations will be forwarded to the contractor for an opportunity for rebuttal and then made available to the Manager, ORO, for consideration in assigning future work to a contractor.

Paragraph No.	Description
IV.B	When necessary or helpful in meeting important ORO objectives, the NEPA Document Manager may form a special team, comprised of relevant ORO personnel and representatives from the Office of the Assistant Manager of Environment, Safety, and Quality and the Office of Chief Counsel, to carry out the NEPA process from start to finish. This will ensure that all relevant programmatic, policy, and legal considerations are taken into account from the beginning and that the only necessary review function is obtaining senior management approval.
IV.C	The NEPA Document Manager is encouraged to consider whether a specific project offers opportunities for innovation in the NEPA process (e.g., using toll-free telephone numbers or computer on-line services for submission of comments).
V.A	NEPA Document Managers will take appropriate action to encourage and facilitate public participation throughout the NEPA process, taking into account Office of Environment, Safety and Health guidance on improving public participation.
V.B	Whenever possible, the NDM and Project Manager will provide enhanced opportunities for public involvement in the EA process, which ordinarily will include at a minimum:
V.B.1	Early public notice of the DOE's intent to prepare an environmental assessment (concurrent with state/tribal notification); and
V.B.2	Opportunity for interested parties, on request, to review environmental assessments (concurrent with state/tribal review) prior to DOE approval.
VI.B	The Office of Environment, Safety and Health will solicit comments from the NEPA Document Manager, the NEPA Compliance Officer, and the team members after completing each EIS and EA on lessons learned in the process and will circulate a quarterly summary to all NEPA Compliance Officers and NEPA Document Managers. The Office of Environment, Safety and Health also will revise its *Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements*, as appropriate, to reflect the lessons learned and will improve Department-wide NEPA policy, directives, guidance, and training accordingly.
VI.E	Within two years, the Manager, ORO, with assistance from the Offices of Environment, Safety and Health and General Counsel, will reduce the median process time for EISs (from NOI to final EIS) to 15 months with no decline in quality. Meeting this objective will, of course, require adjustments to the schedules for EISs now in preparation.
VI.F	In carrying out and improving the NEPA compliance process, the Manager, ORO, should make effective use of the NCO for advice, assistance, training, and coordination.

ATTACHMENT 3

SAMPLE CONTRACTOR NEPA QUALITY ASSURANCE PLAN

NATIONAL ENVIRONMENTAL POLICY ACT QUALITY ASSURANCE PLAN

1.0 BACKGROUND

(NOTE: This section discusses the requirements and applicability of NEPA. The following is an example of text that could be included in this section.)

Compliance with the National Environmental Policy Act (NEPA) is required for all proposed U.S. Department of Energy (DOE) activities affecting the quality of the environment of the United States and its territories or possessions. NEPA requires the analysis and consideration of environmental impacts in federal government decision making. All DOE actions performed by the Oak Ridge Operations Office (ORO) must be reviewed and evaluated for potential environmental impact. Preparation and review of NEPA documents can take several months. It is essential to consider NEPA requirements early in the planning process because (1) DOE regulations require it, (2) it makes for better planning and decision making, and (3) it avoids potential delays and costs to the project. DOE must comply with the NEPA requirements before significant resources are committed to the proposed action.

ORO implementation of this DOE requirement is documented in the operating procedure **(NOTE: List all ORO Contractor operating and administrative NEPA procedures here.)** and individual internal procedures within the affected organizations. Implementation of a Quality Assurance Plan (QAP) will assure continued compliance with NEPA by requiring the evaluation of all controls and documents used in the program.

The QAP is applicable to all activities performed in conjunction with the NEPA Compliance Program. Some requirements and supplemental requirements may be delegated to qualified subcontractors, but the ORO Contractor retains responsibility for the delegated functions and activities.

2.0 DRIVERS

Some DOE orders and memoranda outline authorities and responsibilities within DOE, as well as requirements for document preparation. These requirements are illustrated in ***Figure 1***.

The following documents are used to develop and implement the NEPA Compliance Program. NEPA documents will utilize the applicable requirements of these documents. If additional requirements are added, this QAP will be revised to reflect the most current requirements.

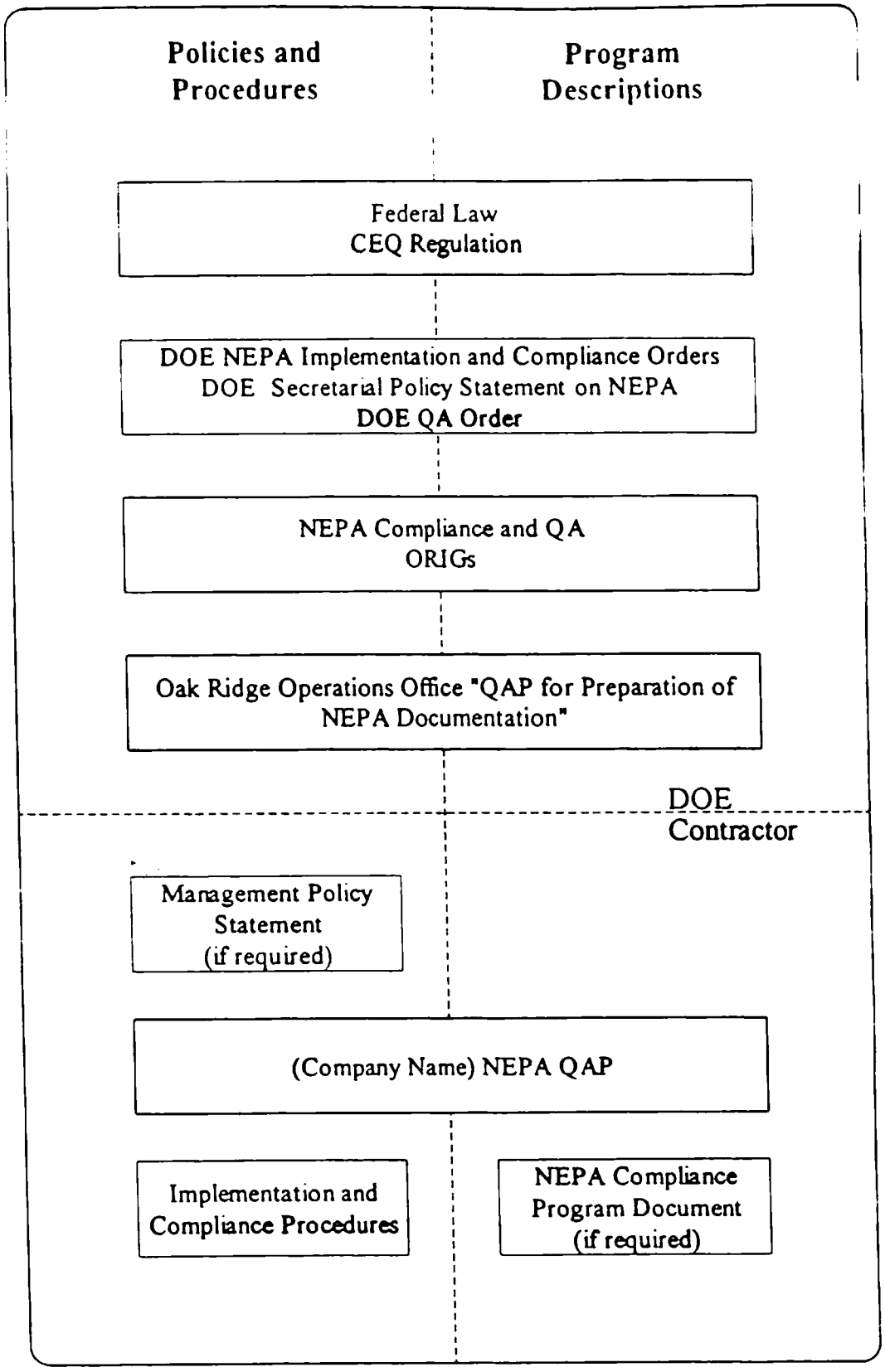


Fig. 1. NEPA Document Hierarchy

8-18-94
NEPA-QAP.DRW

DOE NEPA program drivers include the following:

- "National Environmental Policy Act of 1969," 42 U.S. Code 4321 et seq.
- 40 CFR, 1500-1508, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act"
- 10 CFR 1021, "NEPA Implementing Procedures"
- DOE "Secretarial Policy Statement On The National Environmental Policy Act," June 1994.
- DOE-HQ, "Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements," May 1993
- DOE Order 5440.1E, "NEPA Compliance Program"
- ORIG N 5440.1C, "NEPA Compliance Program"
- 10 CFR 1022, "Compliance with Floodplain/Wetlands Environmental Review Requirements"
- DOE Order 5700.6C, "Quality Assurance"
- ORIG 5700.6D, "Quality Assurance"
- DOE/OR-2008, "Quality Assurance Plan for the National Environmental Policy Act Process"

3.0 GENERAL

(NOTE: This section provides an overview of managerial and organizational responsibilities and commitments. An organizational chart can be used to highlight organizations with responsibility for NEPA compliance. Listed below is an example of how this section could be structured.)

The contractor QAP for the review of NEPA documentation is written to show how the contractor's NEPA Compliance Program satisfies the applicable requirements of DOE Order 5700.6C. To clearly demonstrate this relationship, the contractor QAP is arranged to match the format of DOE Order 5700.6C, Attachment 1, "Quality Assurance Program Implementation Guide."

The contractor's implementation of its QAP at ORO will successfully accomplish the objective of providing and maintaining a prevention-oriented program. A proactive approach to NEPA compliance activities will ensure deliverables meet requirements and satisfy DOE's expectations, now and in the future.

Figure 2 provides the structure for organizations having responsibilities in the contractor's NEPA Compliance Program.

Display company organizational chart here. Include all organizations with responsibility for NEPA documentation preparation, review, and approval.

Fig. 2. Organization chart.

4.0 QUALITY ASSURANCE CRITERIA

Include subsections describing the applicable quality assurance criteria in the areas of management, performance, and assessment as identified in DOE Order 5700.6C. Descriptions of the content of each subsection listed below are included in the DOE Order 5700.6C, Section 9.b., "Quality Assurance Criteria."

4.1 PROGRAM

Describe in detail all contractor's organizations with responsibilities and authority for NEPA compliance.

4.2 PERSONNEL TRAINING AND QUALIFICATION

Discuss NEPA training for responsible individuals (program coordinators) as well as for document preparers.

4.3 QUALITY IMPROVEMENT

Discuss or refer to quality control measures used during document preparation and review.

4.4 DOCUMENTS AND RECORDS

Include a discussion of the tracking system used for tracking NEPA documentation.

4.5 WORK PROCESSES

Discuss processes for document initiation and review. Refer to specific procedures for detail.

4.6 DESIGN

This criteria may not be applicable based on the contractor's NEPA implementation. Refer to DOE Order 5700.6C for detailed description.

4.7 INSPECTION AND ACCEPTANCE TESTING

This criteria may not be applicable based on the contractor's NEPA implementation. Refer to DOE Order 5700.6C for detailed description.

4.8 MANAGEMENT ASSESSMENT

Include a discussion of internal assessments performed by individuals and organizations responsible for program compliance.

4.9 INDEPENDENT ASSESSMENTS

Include a discussion of assessments performed by individuals and organizations (internal or external) who are not responsible for program compliance.