



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

EXECUTIVE OFFICE

June 5, 2015

In reply refer to: A-7

MEMORANDUM FOR ELLIOT E. MAINZER, ADMINISTRATOR and CHIEF EXECUTIVE OFFICER,
BONNEVILLE POWER ADMINISTRATION

THROUGH:

CLAUDIA R. ANDREWS *Claudia R. Andrews*
CHIEF OPERATING OFFICER, BONNEVILLE POWER ADMINISTRATION
JOHN L. HAIRSTON *John L. Hairston*
DEPUTY CHIEF ADMINISTRATIVE OFFICER (ACTING), BONNEVILLE POWER
ADMINISTRATION
THOMAS A. MCDONALD *Thomas A. McDonald*
CHIEF COMPLIANCE OFFICER, COMPLIANCE AND GOVERNANCE (ACTING),
BONNEVILLE POWER ADMINISTRATION

FROM:

BRAD A. BEA *Brad A. Bea*
CHIEF SAFETY OFFICER, BONNEVILLE POWER ADMINISTRATION

SUBJECT:

DIRECTIVES EXEMPTION APPROVAL MEMORANDUM

PURPOSE: To document BPA's exemption to Order 440.1B, *Worker Protection Program for DOE Federal Employees*.

BACKGROUND: This order establishes the framework for a worker protection program and its implementation relies on the use of DOE's Integrated Safety Management (ISM) system. BPA was excluded from the order in 2007. BPA's Safety and Health Program is fully documented in Bonneville Power Administration Policy 420 Occupational Safety and Health, the Bonneville Power Administration Safety and Health Handbook, and Bonneville Power Administration Safety Management Program and supporting procedures.

JUSTIFICATION: BPA operates its safety program to comply with the regulatory requirements in 29 CFR 1960 and OSHA regulations, with oversight from OSHA and is subject to OSHA regulatory audits. Under 29 CFR 1960 and OSHA guidelines, BPA operates consistent with the

order's intent of protecting workers from harm. BPA also participates in reporting at the agency level through DOE CAIRS and DOE's FEOSH requirements and will continue to do so.

Additionally, BPA operates its safety program to conform to the ANSI Z10-2012 Safety Management System Standard (ANSI). This permits BPA to better align its safety and health functions with industry best practice and to audit conformity to discrete elements and controls contained within the standard. BPA's conformance with the ANSI Z10-2012 standard meets or exceeds the intent of this order and the overall direction from associated orders to integrate safety into all management systems.

Additionally, compliance with this order would require BPA to abandon its current use of ANSI and adoption of ISM. This would result in BPA no longer conforming to industry best practice and ANSI compliance. It would also require a costly and extensive organizational-wide assessment and redesign of BPA's existing business operations.

RECOMMENDATION: Recommend that you approve this exemption document.

Elliot E. Mainzer, Administrator and Chief Executive Officer, Bonneville Power Administration

APPROVE:  DISAPPROVE: _____ DATE: 6/26/15

CONCURRENCES/ CONSULTATIONS: Bill McArthur
Director of Office of Worker Safety and Health Policy.

cc:

Skila Harris

Senior Advisor, Power Marketing Administration, Department of Energy