

SUGGESTED ACTIONS

- 1) Identify key opportunities for improvement (Western wide).
 - a) Fast track and tighten-up self assessments by:
 - i) establishing goals and expectations for participation and completion
 - ii) ensuring participation by all Regions
 - iii) ensuring funds/time are available to meet goals
 - iv) establishing some rigor/independence in process (e.g. participation by other functions, cross-region review, external resources)

PLANS FOR IMPROVEMENT

We have begun a fast-track pilot self assessment (SA) and environmental management system (EMS) development project in the Sierra Nevada Region (SNR). The rest of Western will proceed on the schedule described below, using lessons learned in SNR.

All Western programs will be assessed on a three-year cycle. The initial cycle is already underway and will be completed by December 2001. Corrective actions will be taken as soon as they are identified; all will be completed and incorporated in a comprehensive EMS by December 2003.

All regions will participate.

Western has allocated a full-time position in the Corporate Services Office for SA and EMS management. We will evaluate our progress quarterly and adjust the resources allocated as appropriate.

Western's SA process includes participation by other functions and cross-region review. For selected programs we will use external reviewers.

- v) Implement obvious recommendations as they come up rather than waiting to complete the assessments.

We will implement obvious recommendations immediately. b)
Look at all business processes to identify those with potential E. impacts.

- i) identify business activities.
- ii) identify which activities have potential E. impacts.
- iii) define and communicate criteria for triggering E. input/review.
- iv) describe oversight process to make sure there is timely consideration of E. in business decisions.
- v) evaluate business processes periodically to discover opportunities for process improvements and streamlining.

Western is committed to improving our EMS to incorporate more formality and comprehensiveness, and to include the five items listed.

- 2) Expand managers= E. knowledge and ownership at CSO and RMR:
 - a) identify key players for Western's business activities with E. impacts (see 1.b.2 above).
 - b) decide what E. information these players need to make sound decisions.
 - c) provide practical task oriented, experience-based training/work tools to support sound decision-making, timely inclusion of E. considerations.
 - d) evaluate and improve training/tools with feedback from participants; continue to incorporate new Western case studies.

Western is revising the E. order to clarify managers= E. responsibilities. In addition we have already developed a matrix of management positions and E. training needs, position description elements, and performance standards. We have also developed several training modules which can be combined to target specific needs. We will revisit position descriptions and performance standards in light of organizational changes, and provide training to support these responsibilities.3) Develop goals to lead the RMR (Western wide) E. program - go beyond no NOV-s.

- a) tie the goals to the needs and priorities of the E. program and the business processes identified under 1.b.ii.

We will develop E. goals and performance measures as part of EMS development. These will be integrated into Western's strategic planning process begun in 1998. These E. goals will continue to be communicated directly by senior and mid-level managers, as well as through the AClosed Circuit@ and other Western-wide media. We will develop performance measures Aupstream@ of ANo NOVs@.

- b) clearly communicate the goals across the organization.
- c) provide funds/time to meet the goals.
- d) measure and communicate success in achieving goals.

- 4) Evaluate the compliance assurance program (Western wide).
 - a) determine how each Region currently ensures compliance (e.g., auditing, self-inspections, corrective action planning and tracking, etc.)
 - b) determine whether these verification processes are sufficient (e.g., do the personnel doing the evaluation have the proper training, are they thorough, are they sufficiently independent?)
 - c) determine whether these processes are effective in ensuring compliance (e.g., do they account for changes in policy, regulation, do they ensure timely reporting and correction of findings, etc.)
 - d) determine if other actions should be taken to improve compliance assurance.

Western has adopted as the basis of our SA program, the EPA multi-level protocols for federal facilities, with modifications to reflect state requirements and specific applications to the electric power industry. As stated above, we will ensure their effectiveness through periodic third-party audits of selected programs. We will provide consistent SA training to all involved personnel.5)

Improve E. document management within RMR and possibly other Regions.

- a) expand effort to identify key documents and establish Aowners@

Western already maintains and updates E. documents; however, the process is not formalized. We will assign responsibilities for maintaining individual documents, and establish a method for determining when revisions are needed. All E. documents will be available online in digital format. Users will be able to determine the current versions of documents at a central web page.

to manage revisions, distribution, maintenance, etc.

- b) establish process to periodically review and revise E. documents.
 - c) implement document controls (e.g., issue dates, statement on whether revision replaces or modifies previous version, field checks).
- 6) Implement periodic review of environmental management systems.
- a) consider having EMR at other Regions.
 - b) expand management involvement beyond status review to more strategic look at E. contributions to business.
 - c) identify opportunities to improve systems, enhance E. protection, reduce costs and manage potential liabilities.

As part of EMS, Western will periodically review the effectiveness, efficiency and appropriateness of our management systems. As we formalize our EMS, we will perform all the periodic review elements, including assessing strategic business and enhancement opportunities.