

United States Government

Department of Energy
Office of River Protection

memorandum

DATE: **MAR 31 2008**
REPLY TO: TOD:GDT 08-TOD-029
ATTN OF:

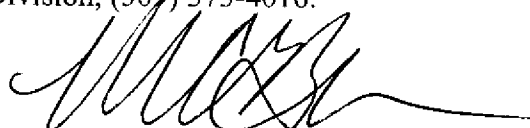
SUBJECT: U.S. DEPARTMENT OF ENERGY (DOE), OFFICE OF RIVER PROTECTION (ORP)
FACILITY REPRESENTATIVE (FR) PROGRAM SELF-ASSESSMENT REPORT

TO: Robert Goldsmith, EM-62 HQ

The Self-Assessment Report for the ORP FR Program is enclosed for your information in accordance with the Facility Representative Standard, DOE-STD-1063.

The ORP FR Program was determined to meet the requirements of the DOE standard. Nine improvement items were identified during the review and corrective actions are currently being developed to incorporate the improvements into the ORP FR program.

If you have any questions please contact me at (509) 373-9150, or your staff may contact Glyn Trenchard, Tank Farms Operations Division, (509) 373-4016.



Mark C. Brown, Director
Tank Farms Operations Division

Enclosure

cc w/encl:
C.C. Scott, EM-62
J. M. Heffner, HS-1.1

Facility Representative Program
U. S. Department of Energy, Office of River Protection

Assessment Report A-08-AMTF-INTERNAL-009

Facility Representative Program

Self-Assessment for 2008

Published March 2008



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Executive Summary

Introduction

This report provides the results of a Self-Assessment of the U.S. Department of Energy, Office of River Protection (ORP) Facility Representative (FR) Program. The mission of the FR Program is to provide effective day-to-day oversight of contractor operations at DOE facilities so that line managers have accurate information on safe work performance. This assessment was conducted in February 2008 through document reviews and interviews with ORP, CH2M Hill Hanford Group, Inc. (CH2M HILL), and Bechtel National Inc. (BNI) personnel that interface with FRs. Along with evaluation of the FR Program using established documents, this assessment used past self assessments to evaluate corrective actions and continuous improvement.

Results

This assessment found that ORP is meeting all FR Program Criteria, this includes:

- Well-trained, qualified FRs
- Adequate coverage for DOE facilities
- FRs provide effective oversight of facilities
- Adequate functional support from the Field Element Management
- Performance assessment and feedback program in place

The Assessment Team identified seven Strengths, one Finding, and eight Observations.

The **Strengths** were:

- The Facility Representative Training Coordinator (FRTC) does an excellent job of maintaining and protecting the test question bank and FR qualification records for ORP.
- ORP Management does an excellent job at providing FRs the resources to qualify in a timely manner.
- The contractors consider the FRs to be technically competent and professional and find that the FR Program improves operations.
- ORP is taking proactive steps to minimize the impacts of future FR attrition.
- The recent selection of a Waste Treatment and Immobilization Plant (WTP) FR Division Director was viewed as a strength by both ORP and BNI individuals.
- The ORP Manager participates in the Tank Farm Operations Division (TOD) Monthly contractor interface meeting
- There is strong ORP Management support up through the ORP Manager for the Lessons Learned program and a commitment to learn from these lessons.

The **Finding** was:

- The Staffing Analysis of FRI-003 does not meet all the requirements of DOE-STD-1063-2006 Appendix C. FRI-003 was last revised in 2005, and as such is written to DOE-STD-1063-2000 rather than the 2006 version. The latter has increased the discussion and expectations related to FR staffing analysis. The Assessment Team found that the overall FR staffing levels to be acceptable, making this an administrative issue rather than a technical one.

The **Observations** were:

- FR continuing training has declined and FRs are not consistently being trained on changes to the Documented Safety Analysis (DSA).
- The current distribution of FRs does not match the Staffing Analysis in FRI-003.
- Many FRs stated that operational oversight would be improved by FRs spending more time in the field actively observing contractor work in their facility.
- There was a lack of consistency in FR use of the Operational Awareness Database (OADB).
- FRs consider the CHRIS training system to be cumbersome and FR training opportunities are not always widely advertised.
- FRs reported that support from technical expertise has been weak at times.
- The dissemination of Lessons Learned information to the FRs frequently includes information that is not applicable to the project which may cause valuable information to receive less than adequate attention.
- The administration of FRIs is not consistent.

Conclusion

This assessment found that ORP is meeting all FR Program Criteria and that ORP management provides strong support for the FR program. While some areas for improvement exist, improvements in many of these areas have been completed or are underway; this includes hiring new/additional technical personnel and establishing and hiring a division director for the FRs at WTP.

Detailed discussion of the assessment results is provided in Section III of this report and recommended corrective actions are provided in Section IV.

I. Introduction

This report provides the results of a Self-Assessment of the U.S. Department of Energy, Office of River Protection (ORP) Facility Representative (FR) Program. The mission of the FR Program is to provide effective day-to-day oversight of contractor operations at DOE facilities so that line managers have accurate information on safe work performance.

The elements that make up an effective FR Program are described in DOE-STD-1063-2006, *Facility Representatives*. These elements are intended to yield a program that provides DOE facilities with well-trained FRs, who spend appropriate amounts of time in their facilities, and can work effectively with their contractor management counterparts. The program, to be effective, needs the functional support of management. To maintain the continued support of DOE management, the FR program needs to demonstrate its continued performance and effectiveness, which is to be assessed periodically.

This assessment was performed with the use of Appendix B of DOE-STD-1063-2006. According to Section 5.8.2 of the standard, self-assessments are conducted every three years evaluating the specific requirements detailed in the standard. The last FR Self Assessment was executed April 2005.

II. Scope

This self-assessment evaluated the effectiveness of the ORP FR Program. The program is comprised of two groups of FRs; one to support operations at the Tank Farms, Evaporators, and 222-S Laboratory, the other to support the Waste Treatment and Immobilization Plant (WTP).

A Criteria, Review and Approach Document (CRAD) was written using the Assessment Lines of Question in DOE-STD-1063-2006 Appendix B.

The Program Objectives that were reviewed (as defined in the CRAD) were:

- 1) Well-trained, qualified FRs
- 2) Adequate coverage for DOE facilities
- 3) FRs provide effective oversight of facilities
- 4) Adequate functional support from the Field Element Management
- 5) Performance assessment and feedback program in place

This assessment was conducted through document reviews and interviews with ORP, CH2M Hill Hanford Group, Inc. (CH2M HILL), and Bechtel National Inc. (BNI) personnel that interface with FRs. Effectiveness of corrective actions from previous self-assessments was also evaluated.

The following definitions are provided to facilitate understanding this report:

Strength – A condition that exceeds expectations and is to be used as an example for others to follow.

Finding - An individual item which does not meet requirements.

Observation - A condition or practice that does not provide or promote effective protection of the health and safety of the public, DOE's workers, or the environment, but is not directly linked to compliance.

III. Assessment Results

A. General

This assessment found that ORP is meeting all FR Program Criteria. The Assessment Team identified seven Strengths, one Finding, and eight Observations. These are discussed in detail below.

Notable strengths were strong ORP management support for the FR program and that the contractors consider the FRs to be technically competent and find that the FR Program improves operations. Areas where there are opportunities for improvement include updates to the Staffing Analysis, improved use of the Operational Awareness Database, and finding and advertising FR-related training opportunities.

The previous (April 2005) self-assessment identified needed improvement in self-assessment corrective action management and initiated a corrective action section of the report to identify actions for closure. The Division Director monitored closure of the corrective actions. This assessment found that the corrective actions were adequately closed. Of the nine issues (one Finding and eight Observations) this year, one similar issue had been noted in prior assessments; this was in the area of continuing training. To address an issue identified in a past self-assessment, individual FRs now actively participate on DSA change reviews. While the practice had been for the FR who was involved in the review to brief the remaining FRs on the change, this is not consistently being performed. This was part of an overall decline in continuing training. This assessment noted that in 2007, the rates of continuing training dropped from the 2005 and 2006 levels. This may have been due to the FRTC being placed on a detail assignment that extended for almost a year. While the detailed FRTC was supplemented with FR assistance, an overall "owner" of the FRTC duties was lacking. The Assessment Team does not consider this a failure to properly implement corrective actions and notes that the TOD Director was aware of the weakness in continuing training and just prior to this assessment had assigned a new FRTC and tasked them to evaluate and address the weakness.

B. Strengths

This assessment identified seven Strengths associated with the ORP FR Program and FRs. As the strengths require no corrective actions, they are summarized here and detailed in the CRADs attached to the report.

- The Facility Representative Training Coordinator (FRTC) does an excellent job of maintaining and protecting the test question bank and FR qualification records for ORP. (Heffner 2/12/08)
- ORP Management does an excellent job at providing FRs the resources to qualify in a timely manner. (Heffner 2/12/08)
- The contractors consider the FRs to be technically competent and professional and find that the FR Program improves operations. (Blanchard 2/25/08)
- ORP is taking proactive steps to minimize the impacts of future FR attrition. (Trenchard 2/15/08)
- The recent selection of a WCD Division Director was viewed as a strength by both ORP and BNI individuals. (Navarro, 2/25/08)
- The ORP Manager participates in the TOD Monthly contractor interface meeting (Trenchard 2/14/08)
- There is strong ORP Management support up through the ORP Manager for the Lessons Learned program and a commitment to learn from these lessons. (Earley 2/14/08)

C. Issues

This assessment identified one Finding and eight Observations.

Finding:

Finding A-08-AMTF-INTERNAL-009-F01: The Staffing Analysis of FRI-003 does not meet all the requirements of 1063-2006 Appendix C. (Trenchard 2/15/08)

Requirement: DOE-STD-1063-2006 Appendix C states that the staffing analysis shall include “A determination of actual staffing based on Facility Representative FTE requirements adjusted to account for actual staff time available to support the facility representative function when competing activities such as collateral duties, leave, training, etc. are considered”.

Discussion: FRI-003 was last revised in 2005, and as such is written to 1063-2000 rather than 1063-2006. The latter has increased the discussion and expectations related to FR staffing analysis. The new Appendix C, added to 1063 in the latest revision 1063-2006 states that the staffing analysis shall include “A determination of actual staffing based on Facility Representative FTE requirements adjusted to account for actual staff time available to support the facility representative function when competing activities such as collateral duties, leave, training, etc. are considered”. FRI-003 did not address this facet of staffing analysis.

Observations:

Observation A-08-AMTF-INTERNAL-009-O01: FR continuing training has declined and FRs are not consistently being trained on DSA changes. (Heffner 2-12-08)

According to the files maintained by the FRTC, a significant decline in continuous training was noticed from 2007 until the time of this assessment. Lack of documentation by the FRTC led to this observation. FRI-004 requires continuing training for all FRs and is intended to enhance FR

knowledge, skills, abilities, and technical capability. The training can include methods such as academic courses, self-study, briefings, contractor provided training and workshops. FRI-004 recommends a minimum of four continuing training sessions per year and even with the decline, this level has been met. Examples of training topics include any new or significant changes to facility hazards or activities that could have an impact on safety and changes to the DSA, or positive USQs. To address an issue identified in a past self-assessment, individual FRs now actively participate on DSA change reviews. While the practice had been for the FR who was involved in the review to brief the remaining FRs on the change, this is not consistently being performed. During a visit to the WTP, it was discovered that some continuing training records were being kept separately by WTP FRs. These included training related to OSHA and PAA. The Assessment Team noted that the TOD Director was aware of the weakness in continuing training and had assigned the new FRTC to evaluate and address the weakness.

Observation A-08-AMTF-INTERNAL-009-O02: The current distribution of FRs does not match the Staffing Analysis in FRI-003. (Trenchard 2/15/08)

FRI-003 shows three Retrieval Operations FRs and two Waste Feed Operations FRs and the current configuration is two in retrieval and three in waste feed.

Observation A-08-AMTF-INTERNAL-009-O03: Many FRs stated that operational oversight would be improved by FRs spending more time in the field actively observing contractor work in their facility. (Trenchard 2/15/08)

A review of the last 12 Quarterly Performance Indicators show that the FRs have consistently exceeded their oversight level goals. Over the last three years, the FR Performance Indicators show that the FRs have spent 47% of their time performing direct oversight and 73% performing overall oversight (which includes both direct and indirect oversight).

The FRs see value in field time and direct contact with workers and oversight of contractor work and feel that they should spend more time in the field actively observing contractor work. This ensures they remain cognizant of contractor performance of work.

For the Tank Farms FRs, the collateral duties had been limited to the Senior FRs; the newly qualified FRs were spending substantial time in the field watching work. In the past six months though, quite possibly due to impacts from the S-102 spill, all Tank Farms FRs have been involved in non-field time duties; this includes preparing for external assessments and validating completion of corrective actions. Other activities include DSA revision analysis and review, Employee Concerns investigation, VPP Program activities, Readiness Program activities, general tours as well as issue research and documentation. Some WTP FRs also reported similar duties preventing field presence. While some of these activities are considered direct oversight, they are not actual field oversight of work.

Observation A-08-AMTF-INTERNAL-009-O04: There was a lack of consistency in FR use of the OADB. (Blanchard 2/25/08)

The OADB is not consistently used by ORP FRs; some FRs diligently document their oversight, while others make minimal entries. Most of the Tank Farm OADB entries do not link to the MAP surveillances and assessments. In most cases, a combination of the Weekly Report and OADB

entries was needed to link back to the MAP because the surveillance guide was not included in the OADB entry.

Observation A-08-AMTF-INTERNAL-009-005: FRs consider the CHRIS training system to be cumbersome and FR training opportunities are not always widely advertised. (Navarro, 2-25-08)

Some FRs reported the current system for scheduling and identifying training opportunities (CHRIS) is not user-friendly, and that Friday Facts for Feds has not generally advertised training that support FR needs.

Observation A-08-AMTF-INTERNAL-009-006: FRs reported that support from technical expertise has been weak at times. (Navarro, 2-25-08)

FRs reported a lack of strong technical support, especially with personnel retirement and transfers. ORP management has recognized this and is taking action; additional SMEs are being hired. One example is the recent hiring of a Radcon point of contact; FRs have established a communication path with the new person.

Observation A-08-AMTF-INTERNAL-009-007: The dissemination of Lessons Learned information to the FRs frequently includes information that is not applicable to the project which may cause valuable information to receive less than adequate attention. (Earley 2/14/08)

There is no graded approach to Lessons Learned (they are not separated into nice-to-know and have-to-know). At times FRs are saving these to read later and not giving them appropriate review.

Observation A-08-AMTF-INTERNAL-009-008: The administration of FRIs is not consistent. (Trenchard 2-26-08)

- FRs access the FRIs electronically. On the signature blocks, some of the FRIs show the date that they were signed, others simply state "signature on file" with no date. In the second case, the effective date cannot readily be determined.
- Some FRIs have a well documented change history, showing what was changed with each revision. Other FRIs do not have this information available. Changes performed in the last year were well documented.
- Some FRIs are signed by both the Tank Farms FR supervisor and the WTP FR supervisor, while others are not, even though they apply to both organizations. FRIs that were changed in the last year were signed by both organizations.
- Some FRIs assign responsibilities to the "FR supervisor"; because two people hold this position, it is not clear who is responsible.

D. Conclusion

This assessment found that ORP is meeting all FR Program Criteria and that ORP management provides strong support for the FR program. While some areas for improvement exist, improvements in many of these areas have been completed or are underway; this includes hiring new/additional technical personnel and establishing and hiring a division director for the FRs at WTP.

IV. Proposed Corrective Actions

Finding A-08-AMTF-INTERNAL-009-F01: The Staffing Analysis of FRI-003 does not meet all the requirements of 1063-2006 Appendix C. (Trenchard 2/15/08)

Proposed Corrective Action: The Assessment Team recommends that ORP revise FRI-003 to meet the 2006 version of DOE-STD-1063 and conduct a staffing analysis using the revised FRI.

Observation A-08-AMTF-INTERNAL-009-O01: FR continuing training has declined and FRs are not consistently being trained on DSA changes. (Heffner 2-12-08)

Proposed Corrective Action: The Assessment Team recommends that the FRTC evaluate and implement methods to plan for and track continuing training. The Assessment Team recommends that FRs who participate in DSA change reviews train (or arrange for others to train) other affected FRs on the scope and details of the change. This training should be tracked as part of continuing training.

While not written as a formal Observation, the Assessment Team recommends that ORP investigate training that would promote leadership or management type skills for FRs. This type of training would make the FR positions more career enhancing. This training is necessary in order to satisfy the intent of DOE-STD-1063 as well as the ORP Site Manager, who supports FRs career advancement. The Assessment Team recommends that the FR Directors review and revise the FRs' Individual Development Plans (IDPs) as appropriate.

Observation A-08-AMTF-INTERNAL-009-O02: The current distribution of FRs does not match the Staffing Analysis in FRI-003. (Trenchard 2/15/08)

Proposed Corrective Action: The Assessment Team recommends that ORP evaluate the current staffing needs and either update the current Staffing Analysis or change the FR distribution to meet the current Staffing Analysis.

Observation A-08-AMTF-INTERNAL-009-O03: Many FRs stated that operational oversight would be improved by FRs spending more time in the field actively observing contractor work in their facility. (Trenchard 2/15/08)

Proposed Corrective Action: The Assessment Team notes the corrective actions for the Finding F01 of this report may assist in determining valid corrective actions for this Observation. Once the staffing analysis evaluates FR time spent on administrative duties, training, collateral duties, and special assessments (as required by DOE-STD-1063-2006 Appendix C), a more complete picture of FR usage of time will be available.

The Assessment Team recommends that the FR Directors evaluate the activities that are preventing FRs from additional field oversight. This does not need to be a large administrative undertaking and could be as simple as routine verbal reports to the Directors. Depending on the results, additional work prioritization/ field oversight expectations provided by the Directors may be beneficial.

The Assessment Team also recommends that the FR Directors continue to closely monitor Performance Indicators, adjusting work assignments accordingly to ensure FR field time goals are achieved and optimized.

Observation A-08-AMTF-INTERNAL-009-O04: There was a lack of consistency in FR use of the OADB. (Blanchard 2/25/08)

Proposed Corrective Action: The Assessment Team recommends that the TOD Director evaluate FR use of the OADB and work with FRs one-on-one to improve the individual use and overall consistency of the OADB. The Assessment Team notes that since this observation was made, ORP has conducted additional training on the OADB.

Observation A-08-AMTF-INTERNAL-009-O05: FRs consider the CHRIS training system to be cumbersome and FR training opportunities are not always widely advertised. (Navarro, 2-25-08)

Proposed Corrective Action: The Assessment Team recommends that the FRTC and FR directors evaluate additional FR training on the CHRIS system. The Assessment Team recommends that the FRTC investigate and periodically notify FRs about training that is useful for FRs. The FRTC and FRs can also use DOE National Training Center and Facility Representative Program websites to find courses helpful to FRs.

Observation A-08-AMTF-INTERNAL-009-O06: FRs reported that support from technical expertise has been weak at times. (Navarro, 2-25-08)

Proposed Corrective Action: The assessment team notes that the recently approved ORP organization includes an Engineering Services Division which includes additional technical expertise that will support FRs in solving technical issues in the field. The timely filling of these technical engineering positions will help resolve this issue. As ORP is in a time of frequent personnel changes, it is recommended that an up-to-date directory of technical personnel and their area of expertise be created and maintained. This will assist the FRs in sustaining effective communication with ORP technical staff.

Observation A-08-AMTF-INTERNAL-009-O07: The dissemination of Lessons Learned information to the FRs frequently includes information that is not applicable to the project which may cause valuable information to receive less than adequate attention. (Earley 2/14/08)

Proposed Corrective Action: The Assessment Team recommends that FRs consider these required reading and at least review each one with enough rigor to evaluate the applicability at their facility. It is anticipated that this will (on the average) take less than five minutes a day. In addition, the pertinent Lessons Learned could be discussed on a routine basis (e.g. at staff meeting) to ensure all the FRs reviewed the Lessons Learned.

Observation A-08-AMTF-INTERNAL-009-008: The administration of FRIs is not consistent. (Trenchard 2-26-08)

Proposed Corrective Action: The Assessment Team recommends that the electronic copies of the FRIs be updated to include the date they were signed. The Assessment Team also recommends that the FRIs be revised to provide clear responsibilities with respect to the “FR supervisor”.

While there is no requirement to document the change history of FRIs, the current practice does provide an excellent document history. To ensure consistent use the change process, FRI-002 could be revised to provide a reminder/guidance to document the change history when making a change to a FRI.

While not written as a formal Observation, the Assessment Team noted that FRI-009 and FRI-010 refer to the Quarterly Report and TOD has transitioned to a Monthly Report (starting April 2007). The Assessment Team recommends that FRI-009 and 010 be revised to reflect the expectations of the Monthly Report.

Attachment– Objective Appraisal Forms

Well-trained, qualified Facility Representatives	Criteria Met: The overall criterion was met with issues
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Criteria I: A Facility Representative training and qualification program is established and results in well-trained, qualified Facility Representatives.

1. Formal training and qualification requirements have been developed and implemented for the Facility Representatives.
2. Management provides the resources necessary to qualify Facility Representatives within a defined schedule.
3. Training and qualification records show that Facility Representatives, who are listed as qualified, have the proper education and experience, and that they have completed all qualification requirements as specified in General Technical Base Qualification Standard (DOE-STD-1146-2001), Facility Representative Functional Area Qualification Standard (DOE-STD-1151-2002), and local directives.
4. The examination process challenges the candidate sufficiently to verify the proper level of knowledge of all qualification areas and facilities and it tests the Facility Representative's technical understanding of facility processes, judgment and decision-making abilities, and ability to communicate expectations to the contractor. Responsible personnel have sufficient applicable experience and/or training to adequately understand the facility's operations and the safety systems under their cognizance.
5. The Field Element Manager designates qualifying officials who are authorized to sign the qualification cards after verifying the candidate possesses the appropriate level of knowledge.
6. Qualification is granted by the Field Element Manager or designee.
7. Training records show that Facility Representatives complete all requalification requirements at the periodicity specified in the program directive.
8. An adequate continuing training program has been established and followed.

Approach

1. Review documentation to determine whether formal training and qualification requirements have been developed for the FRs.
2. Interview FRs to evaluate whether the necessary resources are provided to qualify within a defined schedule.
3. Review documentation to determine whether Training records show that Facility

Representatives, who are listed as qualified, have the proper education and experience, and that they have completed all qualification requirements as specified in General Technical Base Qualification Standard (DOE-STD-1146-2001), Facility Representative Functional Area Qualification Standard (DOE-STD-1151-2002), and local directives.

4. Interview FRs to evaluate whether they have sufficient applicable experience and/or training to adequately understand the facility's operations and the safety systems under their cognizance.
5. Review documentation to determine whether The Field Element Manager designates qualifying officials who are authorized to sign the qualification cards after verifying the candidate possesses the appropriate level of knowledge.
6. Review documentation to determine whether Qualification is granted by the Field Element Manager or designee.
7. Review documentation to determine whether Training records show that FRs complete all requalification requirements at the periodicity specified in the program directive.
8. Interview FRs and review documentation to determine whether an adequate continuing training program has been established and followed.

Discussion of Results

Records/Documents Reviewed:

- ORP FR Test Bank administered by the FR Training Coordinator
- ORP M 420.2C Facility Representative Program
- ORP Facility Representative Program Facility Representative Qualification FRI-004, Revision 4
- DOE-STD 1063-2006, Facility Representatives
- Memorandum from Schepens to Eschenberg, Subject: Designation of the Certifying Official for FR Re-qualification and Cross-qualification Process for the WTP, Dated November 13, 2006.
- Memorandum from Schepens to Brown, Subject: Designation of the Certifying Official for FR Re-qualification and Cross-qualification Process for the Tank Farms, Dated October 20, 2006.
- ORP Facrep records maintained by the ORP Facrep Training Coordinator including qualification records and training records. Specific records reviewed included:
 - Qualification Cards and Records of four currently qualified FRs at TOD
 - Qualification Cards and Records of two currently qualified FRs at TOD
 - Chart Printout of ORP FR Requalification Dates
 - Matrix of FR Continuing Training for CY 2005 and CY 2006

Personnel Interviews:

- ORP Facility Representative Training Coordinator (FRTC)*
- Three qualified FRs in TOD
- Two qualified FRs at WTP
- ORP Site Manager

* will become the WTP Construction Oversight and Assurance Division Director on March 1, 2008.

Evolutions/Operations/Shift Performance Observed:

- Operation of the FR Test Bank.

Analysis

1) Formal training and qualification requirements have been developed and implemented for the Facility Representatives:

This assessment found the formal training and qualification requirements at ORP to be adequate. Formal training and qualification requirements have been developed and implemented for FRs at ORP. The requirements are outlined in FRI-004, and the records are maintained by the FRTC in a locked fire-safe filing cabinet. The exam bank for the written exams, including the Basic Engineering Qualification, 50% Written Exam, and 100% Written Exam, are maintained by the FRTC in a Microsoft Access Database. Questions are selected from the database and an exam is generated by the FRTC for FRs taking qualification exams. A hard copy of all the exam questions is maintained by the FRTC in the fire-safe filing cabinet.

Strength A-08-AMTF-INTERNAL-009-S01: The FRTC does an excellent job of maintaining and protecting the test question bank and FR qualification records for ORP. (Heffner 2-12-08)

2) Management provides the resources necessary to qualify Facility Representatives within a defined schedule:

This assessment found that ORP management adequately provides the resources necessary to qualify FRs within a defined schedule. FRI-004 calls for new individuals entering the Program to fully qualify within 12 months and for FRs to cross-qualify within six months upon re-assignment to a new facility. Based on a thorough review of six FRs qualification records maintained by the FRTC, these requirements are met. Interviews with two recently qualified FRs at TOD, one undergoing initial qualification and one undergoing cross-qualification after transferring from another Site's facility, included specific questions regarding whether ORP management had provided resources necessary to fully qualify them within the designed schedule. Each FR indicated that management allowed them to devote their full schedule towards qualification. Each was provided a mentor in accordance with FRI-004, and received sufficient support from the FR

Program towards preparation for oral boards. While the ORP FRs saw this as normal operations, many sites do not provide this level of focus on qualification.

Strength A-08-AMTF-INTERNAL-009-S02: Site Management does an excellent job at providing FRs the resources to qualify in a timely manner. (Heffner 2-12-08)

One of the interviewees indicated that finding correct system description necessary for his site specific qualification card was difficult at times. For example the FR indicated that he spent a day and a half trying to track down the flow rate of a pump. The other recently qualified FR at TOD indicated that he had no difficulty in determining system descriptions. Overall, each FR indicated that the ORP qualification program was sufficient in preparing them to perform their FR duties at their respective facilities upon qualification.

3) Facility Representatives have the proper education and experience and have completed all qualification requirements:

This assessment found the education and experience of FRs to be adequate. Training and qualification records showed that FRs, who are listed as qualified, have the proper education and experience, and that they have completed all qualification requirements as specified in General Technical Base Qualification Standard (DOE-STD-1146-2001), Facility Representative Functional Area Qualification Standard (DOE-STD-1151-2002), and local directives. FRs interviewed at ORP had proper education and experience backgrounds such as backgrounds included the Navy Nuclear Power Program and shipyard experience, each specifically mentioned in DOE-STD-1063. One of the FRs interviewed had recently transferred to ORP as a FR at the Savannah River Site Office while another was a former contractor at the site. Of the six FR qualifications reviewed only one record was found missing. One of the FRs recently qualified at TOD had no documentation on completion of the GTBQ. A follow-up interview with this FR indicated that he had completed the GTBQ.

4) Adequate Examination Process:

This assessment found the examination process to be adequate. The examination process was found to challenge the candidate sufficiently to verify the proper level of knowledge of all qualification areas and facilities and tests the FRs technical understanding of facility processes, judgment and decision-making abilities, and ability to communicate expectations to the contractor. All qualification exam questions are maintained by the FRTC in a Microsoft Access Database. The database includes roughly 300 questions, and all exams are generated by the FRTC. A backup hard copy of all questions is maintained in the fire-safe cabinet with the FR qualification records. Exams were reviewed during the review of the six qualifications records. These included the FR Basic Engineering Qualification Exam, Core Qualification – FR Functional Area Exam, and the 100% Written Exam. This assessment found each exam to sufficiently verify the proper level of knowledge of all qualification areas and facilities. FRs interviewed indicated that the ORP FR exams were sufficient in preparing FRs to perform their roles and responsibilities.

5) Designation of qualifying officials who are authorized to sign the qualification cards after verifying the candidate possesses the appropriate level of knowledge:

Designation of qualifying officials was found to be adequate and in accordance with DOE-STD-1063 and local ORP procedure FRI-004. This is discussed further in Section 6.

6) Qualification is granted by the Field Element Manager or designee:

This assessment found qualification designation to be adequate. FRI-004 states that upon completion of a final walkthrough by the FR undergoing an initial qualification, the ORP Manager (or designee) will sign the qualification card making the FR fully qualified. For the cases of cross-qualification and requalification, memorandums designating certifying officials have been provided from the Site Manager to the TOD Director and WTP Manager on October 20, 2006 and November 13, 2006, respectively. These individuals were designated as cross-qualification and requalification grantors. Review of qualification records of six ORP FRs as well as interviews with FRs and the Site Manager, indicated that the correct certifying officials in all cases had granted qualification.

7) Appropriate Qualification Periodicity: This assessment found the qualification periodicity to be adequate. Training records showed that FRs complete all qualification requirements at the periodicity specified in the program directive. FRI-004 states that the ORP FR Program is designed to allow full qualification of a new individual entering the program within 12 months. Requalification of FRs at ORP facilities is required every three years in accordance with DOE-STD-1063. FRI-004 states that the FR should obtain an approved requalification card two years and six months after the last qualification date. All qualification records reviewed during this assessment showed all periodicities were met by FRs undergoing initial qualification and requalification. It was further noticed that all FRs undergoing cross-qualification were able to achieve their qualification within six months. Qualification records reviewed indicated that all FRs undergoing requalification were able to do so within three years.

8) An adequate continuing training program has been established and followed:

This assessment found the continuing training program at ORP to be marginal. FRI-004 requires continuing training for all FRs and is intended to enhance FR knowledge, skills, abilities, and technical capability. The training can include methods such as academic courses, self-study, briefings, contractor provided training and workshops. FRI-004 recommends a minimum of four continuing training sessions per year.

FRI-004 states that the FRTC shall retain training class completion records. Individual continuing training records were not found to be well documented. Of the six individual qualification files reviewed in detail, only two of the files contained records of individual training. One of the training records included the completion of a TQP in the area of mechanical systems in 2002. This had occurred before the FR had transferred to ORP. The only other training record included evidence of courses and training in HPI for a single FR.

Group training records, which were kept in a separate folder in the fire-safe filing cabinet, were found to be more abundant than individual records. Summaries were provided by the FRTC of FR

continuing training administered in 2005 and 2006. During those two years documentation showed that continuing training for FRs occurred most months in topics such as:

- Specific Administrative Controls
- Electrical Safety
- ERPG-TEEL
- Radcon
- Human Performance
- Heat Stress
- Fall Protection
- Welding Safety

Observation A-08-AMTF-INTERNAL-009-001: FR continuing training has declined and FRs are not consistently being trained on DSA changes. (Heffner 2-12-08)

According to the files maintained by the FRTC, a significant decline in continuous training was noticed from 2007 until the time of this assessment. Lack of documentation by the FRTC led to this observation. FRI-004 requires continuing training for all FRs and is intended to enhance FR knowledge, skills, abilities, and technical capability. The training can include methods such as academic courses, self-study, briefings, contractor provided training and workshops. FRI-004 recommends a minimum of four continuing training sessions per year and even with the decline, this level has been met. Examples of training topics include any new or significant changes to facility hazards or activities that could have an impact on safety and changes to the DSA, or positive USQs. To address an issue identified in a past self-assessment, individual FRs now actively participate on DSA change reviews. While the practice had been for the FR who was involved in the review to brief the remaining FRs on the change, this is not consistently being performed. During a visit to the WTP, it was discovered that some continuing training records were being kept separately by WTP FRs. These included training related to OSHA and PAA.

The Assessment Team noted that the TOD Director was aware of the weakness in continuing training and had assigned the new FRTC to evaluate and address the weakness.

ORP should include training to promote leadership or management type skills in their continuing training effort. Of the continuing training noticed by this assessment, all was found to enhance FR knowledge, skills, and technical ability in accordance with FRI-004. However, it did not appear in this assessment that ORP provides or encourages FR participation in any training to promote leadership or management type skills to make the FR positions more career enhancing. These types of training are necessary in order to satisfy the intent of DOE-STD-1063 as well as the ORP Site Manager, who supports FRs career advancement. As discussed in CRAD IV, this assessment did note that developmental assignments were available to FRs for skills enhancement; additional training in leadership would complement the experience and help develop the FR.

As qualified FRs gain experience they become valuable DOE resources, and with the proper training they may become prime candidates for positions of higher responsibility at both Headquarters and in the field. DOE-STD-1063 states that Field Element Managers should take the necessary steps to ensure that FR positions are career enhancing and remain desirable to FR

candidates. An interview with the Site Manager revealed her strong support for continuing training opportunities for ORP FRs. It is the opinion of the Site Manager that FRs should receive training allowing them to move up the management chain. Based on the review of records and interviews from this assessment, it is recommended that the FR Program at ORP include training to promote leadership or management type skills in their continuing training effort.

Conclusion

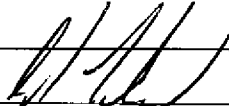
Strengths:

- **Strength: The FRTC does an excellent job of maintaining and protecting the test question bank and FR qualification records for ORP.** (Heffner 2-12-08)
- **Strength: Site Management does an excellent job at providing FRs the resources to qualify in a timely manner.** (Heffner 2-12-08)

Issues:

- **Observation A-08-AMTF-INTERNAL-009-O01: FR continuing training has declined and FRs are not consistently being trained on DSA changes.** (Heffner 2-12-08)

This assessment has determined the CRAD I to be adequate.

Inspected by: James Heffner February 5-7, 2008	Approved by:  Date: 3-24-08
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Adequate coverage for DOE facilities	Criteria Met: The overall criterion was met with issues
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Criteria II: The Facility Representative Program provides adequate coverage for DOE facilities.

1. A current Facility Representative staffing and coverage analysis has been developed in accordance with DOE-STD-1063-2006. Facility Representatives are staffed to the level indicated in the analysis.
2. Methods are developed and documented to ensure that adequate facility coverage is maintained by qualified Facility Representatives during periods of leave, attrition, or downsizing.
3. Management attention is given to address Facility Representative vacancies in a timely manner.
4. Facility Representatives spend 40% of their time in the field and 65% of their time conducting oversight activities.

Approach:

1. Perform document review to verify FR Staffing requirements in FRI-003 reflect current staffing and are in accordance with standard DOE-STD-1063-2006. Determine whether FRs are staffed to the level indicated in the analysis.
2. Interview FRs and the FR supervisors to determine if the methods used by the Field Element to ensure that adequate facility coverage is maintained by qualified FR during periods of leave, attrition, or downsizing is adequate
3. Verify sufficient numbers of FR candidates are undergoing qualification to fill known or projected FR vacancies and determine if there is a FR “pipeline” to train new FR candidates
4. Review quarterly performance indicators and determine if the trend of the reported time spent in the facility and time performing oversight meets the requirements of DOE-STD-1063-2006. Also, interview facility representatives and interfacing organizations to determine if administrative tasks and collateral duty assignments are impacting the ability for facility representatives to effectively oversee contractor activities

Discussion of Results

Records Reviewed:

- FRI-003 Staffing and Coverage of Facility Representatives, Rev 3
- DOE-STD-1063-2006, Facility Representatives, dated April 2006

- U.S. Department of Energy, Office of River Protection (ORP) Facility Representative (FR) Program Performance Indicator (PI) Quarterly Reports, (Last 12 reports- Second Quarter 2005 through First Quarter 2008)

Personnel Interviews:

- FRs (6)
- HR Representative
- Director, TOD

Evolutions/Operations/Shift Performance Observed:

- None

Analysis

1. **A current Facility Representative staffing and coverage analysis has been developed in accordance with DOE-STD-1063-2006. Facility Representatives are staffed to the level indicated in the analysis.**

The FRI-003 establishes the FR staffing and coverage requirements for the U.S. Department of Energy (DOE), Office of River Protection (ORP). The level of staffing and coverage is determined based on an assessment of the hazards presented by each facility. This assessment considers risks to the public, workers, and the environment resulting from operation of the facility, the operational status and activity level of the facility, as well as other factors specified in this instruction. This evaluation of hazards considers radiological, chemical, and physical dangers to workers, the public, and the environment, as well as the barriers against these dangers provided by the facility.

Finding A-08-AMTF-INTERNAL-009-F01: The Staffing Analysis of FRI-003 does not meet all the requirements of 1063-2006 Appendix C. (Trenchard 2/15/08)

FRI-003 was last revised in 2005, and as such is written to 1063-2000 rather than 1063-2006. The latter has increased the discussion and expectations related to FR staffing analysis. The new Appendix C, added to 1063 in the latest revision 1063-2006 states that the staffing analysis shall include "A determination of actual staffing based on Facility Representative FTE requirements adjusted to account for actual staff time available to support the facility representative function when competing activities such as collateral duties, leave, training, etc. are considered". FRI-003 did not address this facet of staffing analysis.

Observation A-08-AMTF-INTERNAL-009-O02: The current distribution of FRs does not match the Staffing Analysis in FRI-003. (Trenchard 2/15/08)

FRI-003 shows three Retrieval Operations FRs and two WFO FRs and the current configuration is two in retrieval and three in WFO.

Two FRs are in the process of moving to new positions (both were promoted; one to Division Director and another to Federal Project Director). As a result, the overall FR staffing does not meet

FRI-003 levels. This is expected and acknowledged in the FR program and ORP has a vacancy announcement to replace the FRs.

Strength A-08-AMTF-INTERNAL-009-S03: ORP is taking proactive steps to minimize the impacts of future FR attrition. (Trenchard 2/15/08)

ORP has begun the process to hire three new FRs. This will replace the two that are leaving and prepare for future attrition by training an additional one. ORP has recognized that in the past it has taken 6 months from identifying an FR need to getting a person on site followed by a 12 month qualification and is taking proactive steps to minimize the impacts of future attrition.

2. Methods are developed and documented to ensure that adequate facility coverage is maintained by qualified Facility Representatives during periods of leave, attrition, or downsizing.

As noted above, FRI-003 *Staffing* does not include a determination of actual staffing based on FTE requirements adjusted to account for actual staff time available to support the facility representative function when competing activities such as collateral duties, leave, training, etc. are considered.

The FRs interviewed stated that FR coverage was managed both within the FRs covering a particular facility and by the DD. The FRs do a good job of filling in for each other – this is FR driven – the FRs state that the DD expects it and the FRs implement it on their own.

There have been times, however, in the last three years where the FR coverage was limited to just a few FRs available. If significant work activity occurs during this time, the remaining FRs are very busy and have had to prioritize what work to observe. In the FR estimation, there are adequate numbers of FRs, but there are times when due to collateral duties and assignments, vacation schedules and work-related travel, it does impact the number of FRs in the field providing thorough oversight. Additionally, as some FRs leave the program, new FRs are trained; training new FRs is given a high priority (see strength), but this also takes the time of qualified FRs.

The FRs feel that they should spend more time in the field actively observing contractor work. The ORP FR PIs document the FR oversight and show that they are meeting the goals of greater than 40% Direct Oversight and greater than 65% Total (Direct and Indirect) Oversight. The direct oversight includes time spent preparing for assessments and reviewing contractor documents and procedures at the job site. As such, activities (including collateral duties) would be counted as oversight, yet still limit the actual field time. FRs see value in field time and direct contact with workers and oversight of contractor work.

Observation A-08-AMTF-INTERNAL-009-O03: Many FRs stated that operational oversight would be improved by FRs spending more time in the field actively observing contractor work in their facility. (Trenchard 2/15/08)

A review of the last 12 Quarterly Performance Indicators show that the FRs have consistently exceeded their oversight level goals. Over the last three years, the FR

Performance Indicators show that the FRs have spent 47% of their time performing direct oversight and 73% performing overall oversight (which includes both direct and indirect oversight).

The FRs see value in field time and direct contact with workers and oversight of contractor work and feel that they should spend more time in the field actively observing contractor work. This ensures they remain cognizant of contractor performance of work.

For the Tank Farms FRs, the collateral duties had been limited to the Senior FRs; the newly qualified FRs were spending substantial time in the field watching work. In the past 6 months though, quite possibly due to impacts from the S-102 spill, all Tank Farms FRs have been involved in non-field time duties; this includes preparing for external assessments, and validating completion of corrective actions. Other activities include DSA revision analysis and review, Employee Concerns investigation, VPP Program activities, Readiness Program activities, General Tours as well as issue research and documentation. Some WTP FRs also reported similar duties preventing field presence. Again, some of these are considered direct oversight, but they are not actual field oversight of work.

3. Management attention is given to address Facility Representative vacancies in a timely manner.

The latest hiring replaced three FRs who left the program; two with promotions and one that transferred to be a FR at another DOE site. In December 2005, a TOD FR was promoted to Federal Project Director. In March 2006, a FR was promoted to the TOD Director position. At that time, the process to hire two replacement FRs began. The third vacancy was created when in May 2006, a TOD FR transferred to be a FR at Brookhaven National Laboratory.

The FRs vacancies were posted in June 2006, interviews were conducted in August and September, and the three new FR candidates were selected. The earliest reported for work in November 2006. This is longer than the normal 90 to 120 days to fill a position

As noted above, ORP is taking proactive steps to minimize the impacts of future FR attrition. ORP has begun the process to hire three new FRs to replace the two that are leaving. ORP has recognized that in the past it has taken 6 months from identifying an FR need to getting a person on site followed by a 12 month qualification and is taking proactive steps to minimize the impacts of future attrition.

4. Facility Representatives spend 40% of their time in the field and 65% of their time conducting oversight activities.

A review of the last 12 Quarterly Performance Indicators show that the FRs have consistently exceeded their oversight level goals. Over the last three years, the FR Performance Indicators show that the FRs have spent 47% of their time performing direct oversight and 73% performing overall oversight (which includes both direct and indirect oversight).

As noted above the FRs see value in field time and direct contact with workers and oversight of contractor work and feel that they should spend more time in the field actively observing contractor work.

For the Tank Farms FRs, the collateral duties had been limited to the Senior FRs; the newly qualified FRs were spending substantial time in the field watching work. In the past 6 months though, quite possibly due to impacts from the S-102 spill, all Tank Farms FRs have been involved in non-field time duties; this includes preparing for external assessments, and validating completion of corrective actions. Other activities include DSA revision analysis and review, Employee Concerns investigation, VPP Program activities, Readiness Program activities, General Tours as well as issue research and documentation. Some WTP FRs also reported similar duties preventing field presence. Again, some of these are considered direct oversight, but they are not actual field oversight of work.

Conclusion

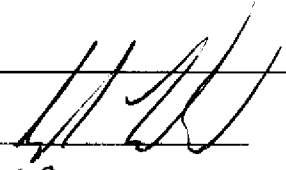
Strength:

- **Strength: ORP is taking proactive steps to minimize the impacts of future FR attrition.** (Trenchard 2/15/08)

Issues:

- **Finding A-08-AMTF-INTERNAL-009-F01: The Staffing Analysis of FRI-003 does not meet all the requirements of 1063-2006 Appendix C.** (Trenchard 2/15/08)
- **Observation A-08-AMTF-INTERNAL-009-O02: The current distribution of FRs does not match the Staffing Analysis in FRI-003.** (Trenchard 2/15/08)
- **Observation A-08-AMTF-INTERNAL-009-O03: Many FRs stated that operational oversight would be improved by FRs spending more time in the field actively observing contractor work in their facility.** (Trenchard 2/15/08)

The requirements of this CRAD have been met.

Inspected by: Dimple Patel and Glyn Trenchard	Approved by:  Date: 3-24-08
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Facility Representatives provide effective oversight of facilities	Criteria Met: The overall criterion was met with issues
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Criteria III: Facility Representatives provide effective oversight to determine that the contractor is operating facilities in a safe manner.

1. Facility Representatives have unencumbered access to their assigned facilities and stop work authority.
2. Facility Representatives accomplish facility assessments, surveillances, and audits as scheduled, and they adequately document findings that are meaningful and consistent with the facility's performance.
3. Facility Representatives reviews of occurrence reports are accomplished in a timely manner while ensuring that the root cause has been determined and effective action proposed.
4. Based on a sample of deficiencies identified by Facility Representatives during reviews, Facility Representatives have evaluated the overall effectiveness of the operating contractor in implementing corrective actions.
5. Facility Representatives report findings, trends, or areas of concern (formally and informally) to the contractor.
6. The Field Element Manager has implemented a process to track identified issues or discrepancies to satisfactory closure.
7. Facility Representatives track, follow-up and close findings from assessments, surveillances, and walkthroughs.
8. Facility Representatives have established mechanisms for communications between DOE and the facility operating contractor and communication is effective.
9. Facility Representatives adhere to proper protocol/rules of conduct while performing their assigned duties.

Approach:

1. Interview FRs to determine whether FRs have unencumbered access to their assigned facilities and stop work authority.
2. Review documentation to evaluate whether FRs accomplish assessments and surveillances as scheduled, and they adequately document findings that are meaningful and consistent with the facility's performance.
3. Review documentation to evaluate whether FRs reviews of occurrence reports are accomplished in a timely manner while ensuring that the root cause has been determined and effective action proposed.
4. Review a sample of deficiencies identified by Facility Representatives to determine whether Facility Representatives have evaluated the overall effectiveness of the operating contractor in implementing corrective actions.
5. Review documentation to evaluate whether Facility Representatives report findings, trends, or areas of concern (formally and informally) to the contractor.

6. Review documentation to evaluate whether The Field Element Manager has implemented a process to track identified issues or discrepancies to satisfactory closure.
7. Review documentation to evaluate whether Facility Representatives track, follow-up and close findings from assessments, surveillances, and walkthroughs.
8. Interview FRs and Contractor Personnel and review documentation to evaluate whether Facility Representatives have established mechanisms for communications between DOE and the facility operating contractor and communication is effective.
9. Interview FRs, FR supervisors and Contractor Personnel to evaluate whether Facility Representatives adhere to proper protocol/rules of conduct while performing their assigned duties.

Discussion of Results

Records Reviewed:

- FRI 001 - Implementation of the ORP Facility Representative Program
- FRI 002 - Preparation, Revision, and Control of Administrative Instructions
- FRI 003 - Staffing and Coverage of Facility Representatives
- FRI 004 - Facility Representative Qualification
- FRI 005 - Stop Work
- FRI 006 - Facility Representative Responsibilities and Routine Activities
- FRI 008 - Event Response, Investigation and Reporting
- FRI 009 - Master Assessment Plans
- FRI 010 - Conduct of Performance Reviews
- FRI 011 - Reports
- FRI 013 – Lead Auditor Qualification
- Sampling of Facility Representative weekly input, Weekly Reports, and Monthly Reports (TF and WTP)
- Sampling of reports from the ORPS database (TF and WTP)
- Corrective Action Assessment in April 2007
- Corrective Action Management Assessment June 2007
- Master Assessment Plan
- Sampling of FR surveillances from the OADB (TF and WTP)

Personnel Interviews:

- ORP Facility Representative Training Coordinator (FRTC)*
- Six qualified FRs in TOD
- Three qualified FRs at WTP
- ORP Site Manager
- ORP Occurrence Reporting Program Manager
- WTP Acceptance Inspector
- ORP Ventilation SSO
- ORP Emergency Preparedness SSO

- ORP Waste Feed Operations and Evaporator Program Manager
- ORP Sampling Program Manager
- Shift Managers
- S Tank Farm Operations Director
- Single Shell Tank Field Crew Manager
- 222-S Facility Operations Manager

* will become the WTP Construction Oversight and Assurance Division Director on March 1, 2008.

Evolutions/Operations/Shift Performance Observed:

- None

Analysis

1. Facility Representatives have unencumbered access to their assigned facilities and stop work authority.

The FRs expressed they had unencumbered access to their assigned facilities and currently have good access to contractor's documentation. The WTP FRs stated that within the past year their access to contractor's documentation had become unencumbered when they were granted access to the contractor's electronic database, where before they did not have this access. The Tank Farm (TF) FRs stated they had always had unencumbered access to the contractor's documentation.

None of the FRs interviewed had exercised a stop work in the last three years. The FRs have identified activities that they would have exercised their stop work authority but the contractor took the action after a discussion of the activity. Through interviews it was determined that there were no occasions where a stop work should have been issued due to the fact that issues raised by the FRs are appropriately reconciled without elevating the concerns to a stop work. All FRs interviewed have had interactions with all levels of DOE and facility management. Both DOE and CH2M HILL have stated that communications are much improved since the last self-assessment.

2. Facility Representatives accomplish facility assessments, surveillances, and audits as scheduled, and they adequately document findings that are meaningful and consistent with the facility's performance.

The Tank Farms (TF) and Waste Treatment Plant (WTP) FRs' assessments and surveillances were reviewed to determine if they are in compliance with the Master Assessment Plan (MAP). The MAP is updated by ORP management to ensure FRs are completing assigned assessments. The MAP requires routine assessments/surveillance in areas which include Maintenance Activities (Surveillance Guide MAS 1.1), TSR verification (Surveillance Guide NSS 18-2), and Conduct of Operations (Surveillance Guides OPS 9.1-18). In addition to the routine surveillances, areas such as Safety System Operability (Surveillance Guide NSS 18-6), fire protection, OSHA compliance, quality acceptance inspections, corrective action management, and construction activities for the WTP. Through the review of Operational Awareness Data Base (OADB) entries and

Weekly/Monthly Reports the required assessments and surveillances were completed per the MAP. When issues were identified they were appropriately documented as a Finding, Observation, Non-Cited Finding, or Concern and transmitted to the contractor in a timely manner.

The WTP OADB entries are standardized and facilitate easy cross reference to the MAP surveillances and assessments. The standardized format includes a surveillance reference number in the title and the body includes a discussion and conclusion section with a Finding section if identified. The standardized format allows for more efficient and effective means to enter the data into the WTP monthly report.

Observation A-08-AMTF-INTERNAL-009-O04: There was a lack of consistency in FR use of the OADB. (Blanchard 2/25/08)

The OADB is not consistently used by ORP FRs; some FRs diligently document their oversight, while others make minimal entries. Most of the Tank Farm OADB entries do not link to the MAP surveillances and assessments. In most cases, a combination of the Weekly Report and OADB entries was needed to link back to the MAP because the surveillance guide was not included in the OADB entry.

3. Facility Representatives reviews of occurrence reports are accomplished in a timely manner while ensuring that the root cause has been determined and effective action proposed.

A sampling of occurrence reports (approximately 23) from Tank Farms and WTP were reviewed from the past three years. The reports reviewed had significance categories 4, 3, 2, and R. In accordance with DOE Order 231.1A, the significance category 2 and R occurrence reports had been approved by FRs in a timely manner. All occurrence reports reviewed had corrective actions documented and appeared to be adequate. Discussions with the Occurrence Reporting Program Manager identified that there were no issues with FRs being delinquent and that the FRs were actively and appropriately managing the occurrence reports in their cognizant areas.

The FRs stated they ensured that the root cause would correct the issue and that the associated corrective actions were effective. At times the FRs has recommended additional corrective actions or identified weaknesses in the evaluation of corrective action (example, training). In all cases, the FRs ensured that required changes to corrective actions were conducted as agreed upon by the contractor.

(Note: This section addresses areas 4, 6 and 7 in one write-up.)

4. Based on a sample of deficiencies identified by Facility Representatives during reviews, Facility Representatives have evaluated the overall effectiveness of the operating contractor in implementing corrective actions.

6. The Field Element Manager has implemented a process to track identified issues or discrepancies to satisfactory closure.

7. Facility Representatives track, follow-up and close findings from assessments, surveillances, and walkthroughs.

Overall the Tank Farm and WTP FRs do evaluate the contractor's implemented corrective actions. The Tank Farm FRs document issues identified in assessments, surveillances and walk downs in the Monthly Reports to the contractors. Historically, each of these issues are entered into the contractors Problem Evaluation Request (PER) system. The PER system is a contractor run issues tracking system. The PER items are tracked in the Electronic Suspense Tracking and Routing System (E-STARs) tracking database. The PER is issued and the FR that found the issue (i.e. Observation, Non Cited Finding, Finding or Concern) is required to approve and validate the Corrective Actions associated with that issue before the PER can be closed. In addition, TOD conducts an annual review of the PER and corrective action management process to evaluate the status of corrective actions identified in the FR Monthly Reports and Occurrence Reports. The weakness associated with this method is that there really was not a DOE based tracking system and the validation and closure of each issue was not necessarily documented by DOE. Recently the FRs identified issues have been included into the DOE Consolidated Action Reporting System (CARS). All FR issues identified in the Monthly Report will now be added to the CARS database. Observations and Non-Cited Findings (which are individual items that do not meet requirements, are considered minor in nature, and are considered to be an isolated non-compliance) will be entered as closed. All Findings and Concerns will be left open and due dates will be associated with closure of the issue. Closure of the issues in CARS will require the FR to document the actions validated for closure. The contractor will still enter the issues into their PER system and will still require the FRs concurrence for closure.

Tank Farms Operations Division (TOD) typically performs an annual review of the contractors corrective actions related to ORPS reportable events. The last assessment was performed in April of 2007. The assessment covered the last 3 years and looked at the number of occurrence reports issued and corrective actions assigned. Corrective actions not immediately closed are assigned a PER number. PER items are tracked in the E-STARs tracking database. The break down of occurrence reports and PER items are as follows:

2004	73 ORs	177 PER items	0 PER items open
2005	77 ORs	104 PER items	0 PER items open
2006	39 ORs	49 PER items	12 PER items open

At the time of the annual review none of the 12 open PER items were beyond their assigned due dates.

The WTP FRs have a system very similar to the Tank Farm FRs, but do a better job of documenting the closure of the issues. Typically the closures of issues are documented in the OADB. WTP FR identified issues are entered into the contractors Project Issue Evaluation Report (PIER) system which is another contractor run tracking system. Also these issues are entered into the OADB and are tracked in that as well, but the OADB does not have the ability to send ticklers to remind the FR to close the issue. Closure of FR identified issues in the PIER system requires FR concurrence and validation of the corrective actions. This is recorded in the OADB. Findings and Concerns are also entered into the DOE CARS system for tracking and closure. Corrective actions associated with WTP Occurrence Reports are tracked by the FRs by listing the Occurrence Reports and assigning a person to verify corrective actions. The closure is documented in the OADB.

5. Facility Representatives report findings, trends, or areas of concern (formally and informally) to the contractor.

The Tank Farm FRs issue formal reports and have formal and informal meetings to communicate findings, trends, and areas of concern to the contractor. The FRs have daily open discussions with cognizant contractor management during morning meetings. The contractor management is generally aware of developing FR issues and is encouraged to comment and communicate corrective actions. Each FR documents their day-to-day activities and enters information into the OADB. This information is compiled at the end of the week and a formal Weekly Report is submitted to the contractor. The Weekly Report includes strengths and issues identified during the week. Typically FRs have weekly meetings with contractor management to discuss issues identified during the week. Formal Monthly Reports are issued to the contractor which include an introduction section with graphics illustrating the number of OADB entries by category and number of deficiencies by type, analysis and discussion of performance, along with a strength and deficiency section that identifies all of the strengths and issues identified during the month. The Monthly Report is augmented with a meeting between the Tank Farm FRs, ORP management and senior contractor management. This Monthly Report is the official transmittal of issues to the contractor.

The WTP FRs issue formal reports and have formal and informal meetings to communicate findings, trends, and areas of concern to the contractor as well. Each morning the WTP FRs attend their respective building's plan of the day/work release meeting. At these meetings the FRs communicate ongoing performance issues with contractor management if appropriate. The FRs are assigned monthly surveillances that align with the MAP and the surveillances were found to be systematically entered into the OADB using a consistent format. These surveillance OADB entries and other OADB entries are used to develop the Monthly Report which is similar to the Tank Farm Monthly Report. In addition to the Monthly Report, the WTP FRs issue a monthly letter to the contractor that officially transmits all issues (Findings, etc). Monthly the WTP FRs and ORP senior management meet with the contractor senior management to discuss the Monthly Report and any identified issues.

The WTP and Tank Farm FRs were identified to have open, consistent, timely, and effective communication to their respective contractors. In both WTP and Tank Farms the Monthly Report/transmittal letter and monthly meeting was the primary formal communication tool for transmitting findings, trends, or areas of concern to the contractor.

6. The Field Element Manager has implemented a process to track identified issues or discrepancies to satisfactory closure.

This subject is addressed in section 4 above.

7. Facility Representatives track, follow-up and close findings from assessments, surveillances, and walkthroughs.

This subject is addressed in section 4 above.

8. Facility Representatives have established mechanisms for communications between DOE and the facility operating contractor and communication is effective.

The FRs for WTP and Tank Farms participate in a conference call each morning with their cognizant organization. These calls include the SSOs, safety bases engineers, budget staff, management and others. Addressed in these calls are the operational status of the FRs' facility (or facilities), safety concerns including relevant lessons learned, environmental issues, reportable events, program funding, special project status, and management direction. This call allows for open communication between the FRs and the rest of the organization on a daily basis where issues can be discussed. Based on interviews, the Tank Farm and WTP staff members have open informal communication with the FRs on an as needed basis. FRs also have weekly meetings to discuss issues identified throughout the week with each other and to discuss validity for the issues. Communication mechanisms between DOE and the contractors are discussed in question 5 above.

9. Facility Representatives adhere to proper protocol/rules of conduct while performing their assigned duties.

The FRs were consistently using the guidance of DOE orders and manuals, Code of Federal Regulations, and ORP guidance documents during daily work. The contractors interviewed stated that the FRs always referenced the applicable requirements when discussing issues. The FRs used the ORP FR instruction to perform their work as well as assessment/surveillance guides, ORP M 220.1, Integrated Assessment Program, and master assessment program. The FRs were found to be systematic in their work activities by using the appropriate regulation and guidance documents.

Several contractor operation managers were interviewed to assess FRs effectiveness in communicating identified issues. All contractor operation managers stated they have an open continual dialog with their respective FRs. Contractor operations managers stated that issues identified by FRs were valid and added value; they appreciated the FRs' independent assessment of field activities. Identified issues were communicated timely which allowed for immediate actions.

Strength A-08-AMTF-INTERNAL-009-S04: The contractors consider the FRs to be technically competent and professional and find the FR Program improve operations.

Conclusion

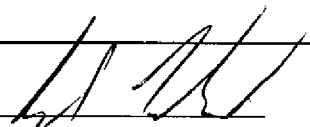
Strength:

- **Strength: The contractors consider the FRs to be technically competent, and professional and find the FR Program improve operations.**

Issue:

- **Observation A-08-AMTF-INTERNAL-009-O04: There was a lack of consistency in FR use of the OADB. (Blanchard 2/25/08)**

The requirements of this CRAD have been met. FRs have been providing effective oversight of the contractor to ensure the facilities are operated in a safe manner. The contractor view the FRs as value added. There were three weakness identified that when corrected will improve the record documenting and tracking.

Inspected by: Courtney Blanchard and Derek Wright	Approved by:  Date: 3-24-08
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Adequate functional support from the Field Element Management	Criteria Met: The overall criterion was met with issues
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Criteria IV: Management provides adequate functional support for Facility Representatives.

1. Management takes steps to ensure that the Facility Representatives' positions are career enhancing and that the reasons for Facility Representatives' attrition are analyzed for improvements where necessary.
2. Continuing training, professional certifications, graduate studies, or similar development activities are actively supported.
3. Line management supports the actions taken by the Facility Representatives at the respective facilities and meets with Facility Representatives periodically through meetings and facility walk downs to share information related to the assigned facilities.
4. Local processes exist to allow Facility Representatives access to Field Element technical expertise regarding contractor issues.
5. Performance indicator data is used to provide indication of the FR program status. Trending and analysis is done on Performance Indicator data.
6. Incentive programs are in place and used effectively for the Facility Representative position.

Approach:

1. Interview FRs and FR supervisors to evaluate whether the FR position is considered career enhancing and to determine if the reasons for FR attrition are analyzed for improvements where necessary.
2. Interview FRs and FR supervisors to evaluate whether continuing training, professional certifications, graduate studies, or similar development activities are actively supported.
3. Interview FRs and FR supervisors to evaluate whether line management supports FR actions and meets with Facility Representatives periodically through meetings and facility walk downs.
4. Interview FRs and FR supervisors to determine what processes exist to allow Facility Representatives access to Field Element technical expertise regarding contractor issues.
5. Interview FR supervisors to evaluate whether trending and analysis is done on Performance Indicator data.
6. Perform document review to determine if incentive programs are in place and used effectively for the Facility Representative position.

Discussion of Results

Records/Documents Reviewed:

- FRI-012, revision 23, ORP Facility Representative Instruction, *ORP Implementation of the Facility Representative Group Retention Allowance*.
- OOD:RGH/02-AMSE-0070, RL MEMO, *Revision of the Group Retention Allowance Program for the Facility Representatives (FR) at RL/ORP*, dated October 16, 2002.

Personnel Interviews:

- ORP Manager (ORP)
- Acting AMTF (ORP)
- WTP Project Manager (ORP)
- TOD Director (ORP)
- FR (ORP) (6)
- Former FR and FPD (ORP)

Evolutions/Operations/Shift Performance Observed:

- Daily AMTF Conference Call
- Daily WTP Conference Call

Analysis

- 1) **Management takes steps to ensure that the Facility Representatives' positions are career enhancing and that the reasons for Facility Representatives' attrition are analyzed for improvements where necessary.**

Interviews with ORP Senior Management and FR Line Management indicated ORP Management is a strong advocate for the advancement of the careers of FRs. They identified several recent FR promotions to either management positions or higher grade positions which they believed were career enhancing. Senior Management also used FRs in assignments that broaden a FR's experience and provide visibility and exposure to senior management. Current FRs interviewed also believed management was supportive of FR careers and that their careers developed strong technical, operational and managerial skills which were career enhancing.

- 2) **Continuing training, professional certifications, graduate studies, or similar development activities are actively supported.**

Interviews and document review showed that ORP management supports FR training and development activities such as special assignments. While joint Individual Development Plans were developed, FRs are expected to identify and request training or advancement opportunities

for their development. The FRs stated there is strong support for training and development activities at the ORP. However, there was some concern the CHRIS system for obtaining training is not user friendly and that information related to FR training opportunities is not widely publicized or easy to locate.

Observation A-08-AMTF-INTERNAL-009-O05: FRs consider the CHRIS training system to be cumbersome and FR training opportunities are not always widely advertised. (Navarro, 2-25-08)

Some FRs reported the current system for scheduling and identifying training opportunities (CHRIS) is not user-friendly, and that Friday Facts for Feds has not generally advertised training that support FR needs.

3) Line management supports the actions taken by the Facility Representatives at the respective facilities and meets with Facility Representatives periodically through meetings and facility walk downs to share information related to the assigned facilities.

Interviews revealed that ORP management feels like they provide an effective means for FRs to identify any needs or issues at their facilities, via daily “morning call” meetings, and regular monthly and/or quarterly meetings with ORP and contractor management. Management provides FRs the support needed to develop issues and visit the site regularly to obtain current status of facilities. Tank Farm FRs stated strongly that they are supported and trusted by management when an issue arises.

Strength A-08-AMTF-INTERNAL-009-S05: The ORP Manager participates in the TOD Monthly contractor interface meeting. (Trenchard 2/14/08)

The TOD FRs meet with the contractor management representatives on a monthly basis to cover issues and discuss the FR Monthly Report. This allows the FRs to discuss their issues and any trends with representatives from all the contractor groups. It ensures that the issues are being communicated throughout the contractor organization. The ORP Manager has made it a practice to attend (in person or by teleconference) this Monthly interface meeting. This allows the Manager to hear the FRs discuss the issues for the month, and shows the contractor that she supports the FRs and their issues. It also allows direct interaction between the Manager, the FRs and the contractor management representatives.

Some WTP FRs indicated there was a time period last year when the categorization of near miss occurrences was not supported by management. This situation improved following an independent review of occurrence categorizations which found categorization to be adequate.

Strength A-08-AMTF-INTERNAL-009-S06: The recent selection of a WCD Division Director was perceived as a strength by both ORP and BNI individuals. (Navarro, 2-25-08)

It is anticipated that the new Director will help in providing a unified voice to BNI and ORP management and a strong coordination between WTP and TF FRs.

4) Local processes exist to allow Facility Representatives access to Field Element technical expertise regarding contractor issues.

ORP Management indicated there are technical staff available and processes like the Integrated Project teams (IPTs), and the morning call for providing FRs with technical support. They identified that some shortages in federal technical staff currently exist, but that support can be made available from the contractor or the RL field office. The FRs noted that this has been an area in need of improvement, and were encouraged by a recent technical staff addition and the proposed new organization that should provide the needed technical support in the future. FRs added that they recognize the strengths of other FRs and routinely seek expertise from within the FR organization.

Observation A-08-AMTF-INTERNAL-009-O06: FRs reported that support from technical expertise has been weak at times. (Navarro, 2-25-08)

FRs reported a lack of strong technical support, especially with personnel retirement and transfers. ORP management has recognized this and is taking action; additional SMEs are being hired. One example is the recent hiring of a Radcon point of contact; FRs have established a communication path with the new person.

5) Performance indicator data is used to provide indication of the FR program status. Trending and analysis is done on Performance Indicator data.

The assessment found that management used Quarterly Performance Indicator data, as well as the Monthly Operational Awareness database reports to perform trending and analysis.

6) Incentive programs are in place and used effectively for the Facility Representative position.

ORP Management conducts an annual staffing analysis and a review of attrition levels for their organization. Management representatives stated that there are currently no issues related to FR attrition. FRs also indicated that attrition is not an issue. This assessment found the incentive program is in place and that ORP management generally believes it is effective, although some believe it is effective and strong, others believe the program needs to be re-visited. Some believe the retention program may be too effective, in that technically strong and knowledgeable individuals will not leave the FR position and it would be desirable to move them to other areas where their technical knowledge would be useful. Others stated a strong counter-point that without the retention incentive, as at some other sites, it would be difficult to attract and retain highly qualified people.

The FRs interviewed believe the retention incentive is very effective in attracting highly qualified people, and because of the extensive qualification process and training required, an attrition problem would be experienced, were it not for the incentive program. They believe that without the incentive, qualified people would not be attracted to the position, and current FRs would have difficulty in remaining in the position. FRs noted that in the past three years, five FRs have left the program; four for a promotion to a FPD or Division Director position, and one for a geographical relocation. As such, out of a pool of 12 qualified FRs, over one per year has been promoted.

Conclusion

Strengths:

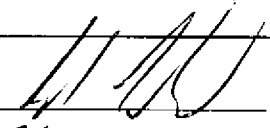
Strength: The ORP Manager participates in the TOD Monthly contractor interface meeting. (Trenchard 2/14/08)

- **Strength: The recent selection of a WCD Division Director was perceived as a strength by both ORP and BNI individuals.** (Navarro, 2/25/08)

Issues:

- **Observation A-08-AMTF-INTERNAL-009-O05: CHRIS training system for obtaining training is considered cumbersome and FR training opportunities are not widely advertised.** (Navarro, 2/25/08)
- **Observation A-08-AMTF-INTERNAL-009-O06: FRs reported that support from technical expertise has been weak at times.** (Navarro, 2/25/08)

This assessment concluded CRAD IV to be adequate and the Criterion has been met.

Inspected by: Jim Navarro	Approved by:  Date: 3-24-08
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Performance assessment and feedback program in place	Criteria Met: The overall criterion was met with issues
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CRITERIA

Criteria V: An adequate performance assessment and feedback program is in place to assess the effective implementation of the Facility Representative Program.

1. Line management conducts self-assessments periodically of the Facility Representative program to ensure that the program is continuing to be effective.
2. Findings from the self-assessments are adequately documented and addressed by management with corrective actions developed, implemented, and verified closed. Improvements to the program were pursued as a result of the self-assessments.
3. Facility Representatives are informed of changes to their facilities and their operating practices. Lessons learned from local facility events and other DOE facilities are sought and disseminated to Facility Representatives.

Approach:

1. Perform document review to determine whether FR program self-assessments are being conducted.
2. Review past Facility Representative self-assessments and the associated corrective action plans to evaluate whether Findings from the self-assessments were adequately documented and addressed by management with corrective actions developed, implemented, and verified closed. Determine whether improvements to the program were pursued as a result of the self-assessments.
3. Interview FRs and FR supervisors to evaluate whether Lessons learned are sought and disseminated to Facility Representatives.

Discussion of Results

Records Reviewed:

FRI – 1, Implementation of the ORP Facility Representative Program
FRI – 4, Facility Representative Qualification
FRI – 6, Facility Representative Responsibilities and Routine Activities
FRI – 9, Master Assessment Plan
FRI-11, Reports

Assistant Manager for Operations Self-Assessment, January 2002
Tank Farm Operations Division and Facility Representative Program Self-Assessment for FY 2005
FY 2005 FR Program Self-Assessment Corrective Action Plan
ORP Corrective Action Status Files
Several ORP FR Weekly Reports

Personnel Interviews:
FRs (4)

Evolutions/Operations/Shift Performance Observed:
None

Analysis

Criteria 1: Line management conducts self-assessments periodically of the Facility Representative program to ensure that the program is continuing to be effective.

Document reviews indicated program self assessments were scheduled and conducted at an adequate periodicity to ensure program health. Assessments were previously conducted in 2002 and in 2005. The current assessment was scheduled for 2007 but resource conflicts caused the schedule to slip until early 2008. In addition, the scope of the assessments that were performed was reviewed to determine if the FR program assessment had adequate depth and breadth. The assessments reviewed appeared to be appropriate to adequately implement program improvements.

This criterion was met.

Criteria 2: Findings from the self-assessments are adequately documented and addressed by management with corrective actions developed, implemented, and verified closed. Improvements to the program were pursued as a result of the self-assessments.

Corrective action plans generated from the previous program assessment were reviewed to determine if the issues identified were appropriately corrected. The actions identified in the plans were all indicated as complete. The completed actions were reviewed to verify adequate implementation. In addition, one issue was previously noted with FR logkeeping which had a specified corrective action to revise FRI-7 which has subsequently been canceled. However, the corrective actions were still captured and implemented via changes to FRI-11.

Previous self assessment deficiencies were also reviewed to determine the effectiveness of older corrective actions. For example, the process of keeping FRs up to date and knowledgeable of Authorization Basis (AB) changes was an issue discussed in the 2005 self assessment but not brought out as a formal issue with a corrective action plan. Interviews with FRs identified that this still is an issue and needs to be resolved. Some of the FRs did not feel they were adequately kept informed of AB changes. This previously occurred in staff meetings with the FR who was cognizant of the change but this practice has waned in the past year or so.

This criterion was met with one issue.

Criteria 3: Facility Representatives are informed of changes to their facilities and their operating practices. Lessons learned from local facility events and other DOE facilities are sought and disseminated to Facility Representatives.

The use and dissemination of lessons learned is being accomplished, but improvements in the process would be beneficial. There was evidence of lessons learned being delivered to the FRs and there was also evidence of strong ORP Management support for the use of lessons learned. The weakness in the program occurs due to the volume of lessons learned events the FRs receives and in most cases without regard to the relevance of the information in the lessons learned. Suggestions were made that there needs to be some sort of lessons learned screening process for project relevance otherwise valuable information may not receive the proper attention due to such a high volume of non-applicable material.

Strength A-08-AMTF-INTERNAL-009-S07: There is strong ORP Management support up through the ORP Manager for the Lessons Learned program and a commitment to learn from these lessons. (Earley 2/14/08)

Observation A-08-AMTF-INTERNAL-009-O07: The dissemination of Lessons Learned information to the FRs frequently includes information that is not applicable to the project which may cause valuable information to receive less than adequate attention. (Earley 2/14/08)

There is no graded approach to Lessons Learned (they are not separated into nice-to-know and have-to-know). At times FRs are saving these to read later and not giving them appropriate review.

Conclusion

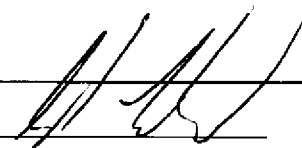
Strength:

- **Strength: There is strong ORP Management support up through the ORP Manager for the Lessons Learned program and a commitment to learn from these lessons. (Earley 2/14/08)**

Issue:

- **Observation A-08-AMTF-INTERNAL-009-O07: The dissemination of Lessons Learned information to the FRs frequently includes information that is not applicable to the project which may cause valuable information to receive less than adequate attention. (Earley 2/14/08)**

This criterion has been met.

Inspected by: Larry Earley	Approved by:  Date: 3-24-08
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General Observation – not specific to any Criteria:

Observation A-08-AMTF-INTERNAL-009-008: The administration of FRIs is not consistent. (Trenchard 2-26-08)

- FRs access the FRIs electronically. On the signature blocks, some of the FRIs show the date that they were signed, others simply state "signature on file" with no date. In the second case, the effective date cannot readily be determined.
- Some FRIs have a well documented change history, showing what was changed with each revision. Other FRIs do not have this information available. Changes performed in the last year were well documented.
- Some FRIs are signed by both the Tank Farms FR supervisor and the WTP FR supervisor, while others are not, even though they apply to both organizations. FRIs that were changed in the last year were signed by both organizations.
- Some FRIs assign responsibilities to the "FR supervisor"; because two people hold this position, it is not clear who is responsible.

Not a formal issue but in the discussion: FRI-009 and FRI-010 refer to the Quarterly Report - TOD has transitioned to a Monthly Report (starting April 2007) so the FRI should be revised to reflect this.

 3.24.08