



Department of Energy
Germantown, MD 20874-1290

July 15, 1999

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington D.C. 20004

Dear Mr. Chairman:

We are pleased to forward the revised Office of Oversight Environment, Safety, and Health (ES&H) Appraisal Process Protocols and associated Revision Report. The report outlines the scope and major modifications to the revised Protocols. This action completes Commitment 5.1.1 of the DOE Implementation Plan for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 98-1, *Department of Energy Plan to Address and Resolve Safety Issues Identified by Internal Independent Oversight*.

If you have any questions, please contact me at 301-903-6457.

Sincerely,

A handwritten signature in black ink, appearing to read "S. David Stadler".

S. David Stadler
Acting Deputy Assistant Secretary
Office of Oversight
Environment, Safety and Health

Enclosures

- 1) Office of Oversight Environment, Safety, and Health Appraisal Process Protocols Revision Report
- 2) Office of Oversight Environment, Safety and Health Appraisal Process Protocols, July 1999



**OFFICE OF OVERSIGHT
ENVIRONMENT, SAFETY, AND HEALTH
APPRAISAL PROCESS PROTOCOLS
REVISION REPORT**

SCOPE OF REVIEW OF EXISTING PROTOCOLS

The Office of Oversight revised its Environment, Safety, and Health (ES&H) Appraisal Process Protocols, in response to Commitment 5.1.1 of the Department of Energy (DOE) Implementation Plan for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 98-1, *Department of Energy Plan to Address and Resolve Safety Issues Identified by Internal Independent Oversight*. This commitment states, "The Office of Oversight will review and modify as necessary its existing Protocols to enhance line management understanding of identified Safety Issues." The revised Protocols also satisfy The Secretary of Energy's March 3, 1999, memorandum on "Safety - Accountability and Performance" that requested the Office of Oversight to immediately develop protocols to define the process for planning, scheduling, and conducting Oversight evaluations. The ES&H Appraisal Process Protocols is a revision to the June 1996 Appraisal Process Guide.

Since our inception in December 1994, the Office of Oversight has evaluated DOE programs, processes, and systems that protect the workers, the environment, and the public. Our goals have been to assess line management's effectiveness in performance and implementation of ES&H policies and programs, add value to line management efforts in resolving identified Safety Issues, and improve the Department's overall safety posture. The independent Oversight appraisals have been consistent, multidisciplinary oversight processes that are continuously coordinated with line management.

The revised Protocols describe the process and principal activities used internally by the Office of Oversight to assess line management's effectiveness in implementation of ES&H policies and programs based on the Department's guiding principles and core functions for integrated safety management pursuant to DOE P 450.4, Safety Management System Policy. Changes outlined in the revised Protocols have been the result of changes in DOE program direction and guidance, insights gained from continuous self-assessments and lessons learned of our appraisal activities, and feedback from our customers and constituents. Many of these changes have already been implemented as we continuously strive to provide the most current, fully integrated, and coordinated appraisal methods focused on identifying the significant ES&H issues.

The Office of Oversight coordinated its actions regarding Commitment 5.1.1 with the Safety Management Implementation Team (SMIT) Leader, the Integrated Corrective Action Management Team (I-CAM) Leader, the Office of Nuclear Safety Policy and Standards, Department managers working on the DOE Corrective Actions Tracking System, and other DOE and contractor line managers. This was to ensure our revised Protocols would be in agreement and compatible with other actions being completed under the DOE Implementation Plan for DNFSB Recommendation 98-1.

The revised Office of Oversight ES&H Appraisal Process Protocols were disseminated to 85 DOE organizational elements including all Headquarters Cognizant Secretarial Offices; Operations and Field Office Managers; Area, Site, and Project Offices; National Laboratory Directors; DNFSB and its staff; and principal contractors at each DOE site for their review and comment. This gave Oversight customers and constituents an opportunity to review and comment on our revised internal procedures. Responses were formally received from 37 organizational elements with a total of over 200 comments. The comments and recommendations were reviewed and incorporated into the revised Protocols as appropriate. The Oversight ES&H Appraisal Process Protocols were then redistributed to the DOE organizations for a second review and published on July 15, 1999.

DESCRIPTION OF MODIFICATIONS

Changes were made to update the Appraisal Process Protocols. A summary of these changes is provided below.

- **Oversight Vision, Mission and Scope of Activities:** Updated the overall direction of Oversight incorporating revised DOE directives, feedback elicited from line management, activities addressed by the DNFSB, and results of Oversight appraisal lessons learned. This has included implementation and institutionalization of integrated safety management in all Oversight activities to enhance the protection of workers, the public, and environment.
- **Approach to Conducting Evaluations:** Modified the integrated safety management evaluation framework and process built around the seven guiding principles and five core functions. This included an updated outline of Oversight appraisal process activities and tasks through all phases of the appraisal process. Clarified discussions on interactions with Headquarters and site counterparts; and outlined the internal process used by Oversight managers in selecting and scheduling DOE sites for Oversight appraisal activities.
- **Safety Management Appraisal Template:** Updated the safety management appraisal "template" to describe the revised elements in the guiding principles and core functions supported by criteria used by the Office of Oversight to evaluate the effectiveness of integrated safety management systems within DOE. The template clarifies the interrelationships between the guiding principles and core functions of integrated safety management, and outlines criteria to describe the attributes of each principle and function. Improved the usability of the template as a diagnostic tool and reference guide to assist Oversight teams during all phases of appraisal activities. Included the revised template as an appendix to the Protocols.
- **Analysis of Results:** Detailed the continuous process for analyzing results during Oversight appraisal activities. Performance criteria for each guiding principle and core function were emphasized as a primary analysis tool throughout the appraisal process - including daily team meetings, rollup of information, midpoint analysis meetings, and final determination of ratings. Guidelines for collating, organizing, and analyzing the data; developing analysis; and presentation of the analysis results were added. Factors considered in these analysis activities were also listed.

- **Identification of Safety Issues, Opportunities for Improvement, and Noteworthy Practices:** Incorporated the definition, explanation, illustration, and listing of Safety Issues. Specific factors in identification of potential Safety Issues and how they should be addressed in the Oversight report have been clearly articulated. Also outlined are Opportunities for Improvement as recommendations intended to assist line management in resolving problems observed or enhancing ES&H programs and Noteworthy Practices identified during the conduct of an Oversight evaluation that could provide a valuable source of lessons learned for other DOE sites.
- **Interfaces for Safety Issues and Corrective Actions:** Described the development and identification of Safety Issues requiring cognizant line management evaluation and determination of appropriate corrective actions. Outlined Oversight's role in the line management corrective action process established by the Department's March 10, 1999, Implementation Plan for DNFSB 98-1 to address and resolve Safety Issues identified. This included a brief explanation of roles and responsibilities in the corrective action process, tracking of corrective actions, and Oversight follow-up on the status of the corrective actions.
- **Appraisal Validation Strategy:** Updated the appraisal validation strategy to enhance verification of data and information collected by the Oversight team members at various stages of the appraisal process. This included increased emphasis on interaction with site counterparts and site managers, on-the-spot validations summarizing observations and concerns, coordination of Safety Issues related to Headquarters and other organizations not located at the site, and continuous internal communications among the Oversight team members. Both formal and informal validation methods were outlined.
- **Oversight Evaluation Team Roles, Structure and Activities:** Revised the evaluation team activities in response to changes in the scope of the appraisal process and results of previous lessons learned. Increased emphasis was focused on team communications, technical and evaluation training and qualifications, and utilization of status reports to document evaluation activities. In addition, the composition, qualifications, and roles and responsibilities of the evaluation team members regarding technical and appraisal expertise, continuing individual and team training, and their specific evaluation activities were expanded.
- **Evaluation Planning Focus:** Oversight evaluation planning was revamped to increase concentration on the seven guiding principles and five core functions to identify specific data-gathering activities. The Oversight technical specialist role was expanded to apply the core functions for evaluating site performance of selected facilities, programs, and activities and the effectiveness of specific ES&H support disciplines related to those work processes. Highlighted the importance of the team leader's coordination with line management during the early planning phases to define key site documents including requirements listed or contained in site contracts and subcontracts. Detailed examples of a safety management evaluation plan and scoping visit briefing were added in the Protocols.

- **Report Writing Development and Review Process:** Updated the appraisal report format utilizing the conceptual framework outlined in DOE P 450.4 and the safety management template. Specific Safety Issues identified for corrective action and follow-up are being formally listed. Opportunities for Improvement and Noteworthy Practices have been incorporated as part of the report. A more detailed accounting of the final report development and review process involving the Oversight team and site management was also included.
- **Other Changes to Enhance the Process Protocols:**
 - Made more visible the team's identification and use of ES&H requirements, DOE directives, and site contracts.
 - Discussed different purposes served by the Oversight Safety Management Template and DOE Integrated Safety Management System (ISMS) Verification Team Leader's Handbook.
 - Described analysis support during the planning phase in searching qualitative and quantitative data sources.
 - Defined Cognizant Line Management, ES&H Management, External Stakeholders, Noteworthy Practices, Opportunities for Improvement, and Safety Issues.
 - Provided additional Samples and Examples of Appraisal Planning and Data Collection Activities and Reports.

CONCLUSION

The Office of Oversight has revised its Protocols for conducting independent appraisals as part of its continuing effort to enhance the quality and consistency of oversight activities and to complete Commitment 5.1.1 of the Implementation Plan for DNFSB Recommendation 98-1.

The Protocols describe the integrated safety management evaluation process used to review and assess line management's performance and implementation of DOE policy, orders, standards, guides, and other applicable ES&H requirements. While the Protocols concentrate primarily on the conduct of integrated safety management evaluations, the processes are also applicable to other oversight appraisal activities. Special studies, event reviews, follow-up assessments, focused reviews, and accident investigations may differ from the integrated safety management evaluations in scope, team size, duration, or report format, but the key elements of the Protocols remain applicable, such as planning and preparation; team code of conduct; interviews, observations, and walkdowns; open dialogue with line management; internal quality review; and validation of results. Furthermore, no two sites are alike, and accordingly, no two appraisals will be alike. The guidance provided in the revised ES&H Appraisal Process Protocols has been developed to be flexible and easily adapted as it is applied to each site, facility, and activity evaluated by the Office of Oversight.

The Office of Oversight will continue to update and improve the Appraisal Process Protocols to ensure we maintain the most credible, value-added product that meets the needs of DOE line management in their efforts to implement ES&H policies and programs and to protect workers, the public, and the environment.