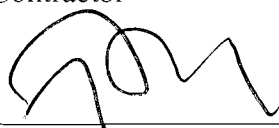
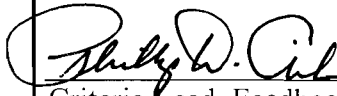


<p>U.S. Department of Energy</p> <p>Office of Independent Oversight</p> <p>Criteria Review and Approval Document</p>	<p>Subject: Feedback and Continuous Improvement Inspection Criteria and Approach – Contractor</p>  <hr/> <p>Director, Office of ES&H Evaluations</p> <p>Date: 12/4/07</p>  <hr/> <p>Criteria Lead, Feedback and Continuous Improvement Inspection Criteria and Approach – Contractor</p> <p>Date: 12/5/07</p>	<p>HS: HSS CRAD 64-20</p> <p>Rev: 0</p> <p>Eff. Date: 12/04/2007</p> <p>Page 1 of 14</p>
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1.0 PURPOSE

Within the Office of Independent Oversight, the Office of Environment, Safety and Health (ES&H) Evaluations' mission is to assess the effectiveness of those environment, safety, and health systems and practices used by field organizations in implementing Integrated Safety Management and to provide clear, concise, and independent evaluations of performance in protecting our workers, the public, and the environment from the hazards associated with Department of Energy (DOE) activities and sites. A key to success is the rigor and comprehensiveness of our process; and as with any process, we continually strive to improve and provide additional value and insight to field operations. Integral to this is our commitment to enhance our program. Therefore, we have revised our Inspection Criteria, Approach, and Lines of Inquiry for internal use and also we are making them available for use by DOE line and contractor assessment personnel in developing and implementing effective DOE oversight and contractor self-assessment and corrective action processes on this WEB page.

2.0 APPLICABILITY

The following Inspection Criteria document is approved for use by the Office of ES&H Evaluations.

3.0 FEEDBACK

Comments and suggestions for improvements on these Inspection Criteria, Approach, and Lines of Inquiry can be directed to the Director of the Office of ES&H Evaluations on (301) 903-5392.

Feedback and Continuous Improvement Contractor Inspection Criteria, Activities and Lines of Inquiry

Contractor Assurance System Inspection Criteria - Contractor management has established a comprehensive and integrated contractor assurance system for ensuring the protection of the public, workers, environment and national security assets through continuous improvement for environment, safety, and health; safeguards and security; cyber security; and emergency management. The contractor's assurance system programs and processes are in accordance with the policy and key elements outlined in DOE Policy 226.1, *Department of Energy Oversight Policy*, DOE Order 226.1A, *Implementation of Department of Energy Oversight Policy*, Attachment 1, quality assurance requirements (as stated in 10 CFR 830, Subpart A, DOE Order 414.1C, *Quality Assurance*, or other applicable regulations), other applicable DOE directives, and contract terms and conditions.

1. A program description document that fully details the programs and processes that comprise the contractor assurance system has been developed, approved by contractor management, and forwarded to DOE for review and approval. The program description is reviewed and updated annually and forwarded to DOE for review and approval.
2. The contractor assurance system includes assessment activities (self-assessments, management assessments, and internal independent assessments as defined by laws, regulations, and DOE directives such as quality assurance program requirements) and other structured operational awareness activities; incident/event reporting processes, including occupational injury and illness and operational accident investigations; worker feedback mechanisms; issues management; lessons-learned programs; and performance indicators/measures.
3. The contractor's assurance system monitors and evaluates all work performed under their contract, including the work of subcontractors.
4. Contractor assurance system data is formally documented and available to DOE line management. Results of assurance processes are periodically analyzed, compiled, and reported to DOE line management as part of formal contract performance evaluation.
5. Contractors have established and implemented sufficient processes (e.g., self-assessments, corporate audits, third-party certifications or external reviews, performance indicators) for measuring the effectiveness of contractor assurance system elements.
6. Requirements and formal processes have been established and implemented that ensure personnel responsible for managing and performing assurance activities possess appropriate experience, knowledge, skills, and abilities commensurate with their responsibilities.

Contractor Assessment and Performance Measurement Inspection Criteria - Contractor management has established a rigorous and credible assessment program that evaluates the adequacy of programs, processes, and performance on a recurring basis. Formal mechanisms and processes have been established for collecting both qualitative and quantitative information on performance, and this information is effectively used as the basis for informed management

decisions to improve performance. The contractor's assessment and performance measurement programs and processes are in accordance with the policy and key elements outlined in DOE Order 226.1A, *Implementation of Department of Energy Oversight Policy*, Attachment 1; quality assurance requirements (as stated in 10 CFR 830, Subpart A, and DOE Order 414.1C, *Quality Assurance*, and other applicable regulations or DOE directives); and contract terms and conditions.

1. Line management has established and implemented a rigorous assessment program for performing comprehensive evaluations of all functional areas, programs, facilities, and organizational elements, including subcontractors, with a frequency, scope and rigor based on appropriate analysis of risks. The scope and frequency of assessments are defined in site plans and program documents, include assessments of processes and performance-based observation of activities and evaluation of cross-cutting issues and programs, and meet or exceed requirements of applicable DOE directives.
2. Rigorous self-assessments are identified, planned, and performed at all levels periodically to determine the effectiveness of policies, requirements, and standards and the implementation status.
3. Appropriate independent internal assessments are identified, planned, and performed by contractor organizations or personnel having the authority and independence from line management to support unbiased evaluations.
4. Line managers have established programs and processes to routinely identify, gather, verify, analyze, trend, disseminate, and make use of performance measures that provide contractor and DOE management with indicators of overall performance, the effectiveness of assurance system elements, and identification of specific positive or negative trends. Approved performance measures provide information that indicates how work is being performed and are clearly linked to performance objectives and expectations established by management.
5. Line managers effectively utilize performance measures to demonstrate performance improvement or deterioration relative to identified goals, in allocating resources and establishing performance goals, in development of timely compensatory measures and corrective actions for adverse trends, and in sharing good practices and lessons learned.

Contractor Event Reporting Inspection Criteria - Contractor management has implemented formal programs to identify issues and report, analyze, and address operational events, accidents and injuries.

1. Formal programs and processes have been established to identify issues and report, analyze, and address operational events, accidents, and injuries. Events, accidents, and injuries are promptly and thoroughly reported and investigated, including the identification and resolution of root causes and management and programmatic weaknesses, and distribution of lessons learned in accordance with applicable DOE directives (e.g., Manual 231.1-2, *Occurrence Reporting and Processing of Operations Information*; Manual 231.1-1A, *Environment, Safety and Health Reporting Manual*; Order 225.1A, *Accident Investigations*; and Order 5480.19, *Conduct of Operations Requirements for DOE Facilities*).
2. Reporting of operational events, accidents, and injuries are conducted in accordance with applicable nuclear, security, environment, occupational safety and health, and quality

assurance requirements, applicable DOE directives, and contract terms and conditions. Trending analysis of events, accidents, and injuries are performed in accordance with structured/formal processes and applicable DOE directives (e.g., Manual 231.1-2).

Contractor Operating Experience/Lessons Learned Inspection Criteria - Contractor management has established formal programs to communicate operating experience/lessons learned during work activities, process reviews, and incident/event analyses to potential users and applied to future work activities (in accordance with DOE O 226.1A and DOE O 210.2).

1. Formal processes are in place to identify applicable lessons learned from external and internal sources and any necessary corrective and preventive actions, disseminate lessons learned to targeted audiences, and ensure that lessons learned are understood and applied.
2. Formal programs and processes have been established and implemented to solicit feedback from workers and work activities on the effectiveness of work definition, hazard analyses and controls, and implementation for all types of work activities, and to apply lessons learned.
3. Line managers effectively identify, apply, and exchange lessons learned with the rest of the DOE complex. Lessons learned identified by other DOE organizations and external sources are reviewed and applied by line management to prevent similar incidents/events.

Contractor Issues Management Inspection Criteria - Contractor management has established a comprehensive, structured issues management system that provides for the timely and effective resolution of deficiencies and meets the requirements of DOE Order 226.1 and DOE Order 414.1C.

1. Program and performance deficiencies, regardless of their source, are captured in a system or systems that provide(s) for effective analysis, resolution, and tracking. Issues management system elements include structured processes for determination of risk, significance, and priority of deficiencies; evaluation of scope and extent of condition; determination of reportability under applicable requirements; identification of root causes; identification and documentation of corrective actions and recurrence controls to prevent recurrence; identification of individuals/organizations responsible for corrective action implementation; establishment of milestones based on significance and risk for completion of corrective actions; tracking progress; verification of corrective action completion; and validation of corrective action implementation and effectiveness.
2. Issues management processes include mechanisms to promptly identify the potential impact of a deficiency and take timely actions to address conditions of immediate concern, including stopping work, system shutdown, emergency response, reporting to management, and compensatory measures pending formal documentation and resolution of the issue.
3. Processes for analyzing deficiencies, individually and collectively, have been established that are designed to effectively identify programmatic or systemic issues. Line management effectively monitors progress and optimizes the allocation of assessment resources in addressing known systemic issues.
4. Processes for communicating issues up the management chain to senior management have been established and based on a graded approach that considers hazards and risks. Line

management receives periodic information on the status of identified deficiencies and corrective actions and holds organizations and individuals accountable for timely and effective completion of actions. Line management has executed graded mechanisms such as independent verification and performance-based evaluation to ensure that corrective action and recurrence controls are timely, complete, and effective. Closure of corrective actions and deficiencies are based on objective, technically sound, and verified evidence. The effectiveness of corrective actions is determined on a graded basis and additional actions are completed as necessary.

Contractor Worker Feedback Inspection Criteria - Contractor management has established a comprehensive, structured issues management system that provides for the timely and effective resolution of employee concerns and feedback on safety performance from workers that meets the requirements of DOE Order 226.1A and DOE Order 442.1A, *Department of Energy Employee Concerns Program*. Additionally, an effective differing professional opinion process or program has been established and implemented in accordance with the Contractor Requirements Document associated with DOE M 442.1-1, *Differing Professional Opinions Manual*.

Contractor Review Approach - Review appropriate contractor directives, policies, program descriptions, procedures, instructions, guidance, and contractual requirements. Review assessment activity schedules for independent, management, and other self-assessments and external reviews/inspections. Review assessment reports for adequacy. Interview contractor and subcontractor managers and staff to determine how assessments are planned and performed and how they are used to improve performance. Interview operating experience/lessons learned coordinators, work planners, and training personnel and evaluate operating experience/lessons learned program documentation, including procedures and records, to determine the adequacy of implementation of these programs. Review documentation related to deficiencies (e.g., procedures, completed assessments, employee concern case files, occupational injury and illness reports, operational incident/event reports (e.g., critique minutes and occurrence reports), deficiency reports, causal analyses and corrective action plans, verification/validation records, and effectiveness determinations). Review trend analysis and performance indicator reports and evaluate the analyses, conclusions, and any related corrective actions.

Contractor Inspection Lines of Inquiry

Contractor Assurance System/Oversight Program Lines of Inquiry

1. Processes – Are the processes that constitute the Contractor Assurance System formal and documented and, when taken together, meet the requirements of DOE O 226.1A?
 - a. Does the contractor assurance system program description document (or equivalent) require and adequately describe a comprehensive and integrated set of processes and activities to identify and address program and performance deficiencies, and opportunities for improvement; provide the means and requirements to report deficiencies to the responsible managers and authorities; establish and effectively implement

- corrective and preventive actions; and share lessons learned across all aspects of operations as specified in DOE O 226.1A, Attachment 1?
- b. Does the contractor assurance system include self-evaluations of compliance with applicable laws, regulations, national standards, DOE directives, and DOE-approved plans and program documents, site-specific procedures/manuals, criteria review and approach documents, contractual performance objectives, and other contractually mandated requirements?
 - c. Does the contractor assurance system require monitoring and evaluation of all work performed under their contracts, including subcontractors?
 - d. Has the contractor established processes and mechanisms, such as use of corporate audits, third party certifications, or other external reviews in designing and implementing the contractor's assurance system for measuring the effectiveness of program elements?
 - e. Has the contractor defined their processes for review and communication to DOE management problems identified with DOE directives or site-specific requirements that conflict, are unclear, or are incomplete?
 - f. Has the program description document been approved by contractor management and DOE?
2. Training and Qualification – Are personnel implementing Contractor Assurance System processes adequately trained and qualified to perform assigned oversight activities (in accordance with DOE O 226.1A, DOE M 360.1-1B, and DOE M 426.1-1A)?
- a. Has the contractor defined the requirements for experience, knowledge, skills and abilities for personnel implementing the assurance system elements?
 - b. Has the contractor established, maintained, and implemented appropriate qualification standards for personnel with oversight responsibilities?
 - c. Has the contractor provided and ensured completion of appropriate training for personnel who manage and perform assurance functions, in that they must possess experience, knowledge, skills, and abilities commensurate with their responsibilities?
3. Implementation of Program Responsibilities – Are Contractor Assurance System responsibilities appropriately implemented?
- a. Has the contractor monitored and evaluated all work performed under their contracts, including subcontractors?
 - b. Is DOE line management provided with unfettered access to facilities and contractor activities and to contractor assurance system data?
 - c. Does the contractor submit to DOE for annual review and approval a revised contractor assurance system program description document (or equivalent).
4. Assurance System Oversight Results and Corrective Action Process – Are the results of Contractor Assurance System activities appropriately validated, documented, communicated, classified, evaluated, tracked and resolved?

- a. Are deficiencies in programs or performance identified during assessment activities communicated to appropriate management for resolution through a structured issues management process that identifies causes and provides effective recurrence controls?
- b. Are the results of assurance system processes periodically analyzed and reported to DOE in support of formal contract evaluations?

Contractor Assessment and Performance Measurement Program Lines of Inquiry

1. Process - Are the processes for assessment and performance measurement formal and documented and, when taken together, meet the requirements of DOE Order 226.1 and DOE Order 414.1C?
 - a. Has the contractor established appropriate, formal processes and procedures for conducting self-assessments and internal independent assessments of all programs, processes, and performance of facilities, systems, and organizational elements, including subcontractors?
 - b. Do these processes and procedures adequately detail the requirements for all types of assessment and performance measurement activities, such as management walkthroughs, surveillance and inspection activities, formal assessments and reviews, and post-job reviews?
 - c. Have guidance and support tools such as checklists, templates, and databases been provided?
 - d. Has the contractor established appropriate and formal processes and procedures for identifying, monitoring, analyzing data measuring the performance of facilities, programs, and organizations and for identifying and implementing needed actions and opportunities for performance improvement?
 - e. Do self-assessment processes encourage and facilitate the involvement of workers, supervisors, and managers to develop assessment skills and abilities?
 - f. Have adequate processes, procedures, and guidance been developed to ensure an effective performance indicator program?
 - g. Have the appropriate performance indicators and parameters been selected to effectively measure performance and identify adverse trends in a timely manner to ensure prompt mitigation and corrective actions?
 - h. Do assessment and performance measurement program procedures provide appropriate linkages to the issues management, corrective action, and reporting processes?
2. Training & Qualification – Are personnel implementing the assessment and performance measurement program processes adequately trained and qualified to perform assigned oversight activities?
 - a. Has the contractor defined the requirements for experience, knowledge, skills and abilities for personnel implementing assessment and performance measurement activities?

- b. Has the contractor provided and ensured completion of appropriate training for personnel implementing assessment and performance measurement activities?
3. Implementation of Program Responsibilities – Are assessment and performance measurement program responsibilities appropriately implemented?
- a. Does line management routinely monitor and observe the activities of their workforce to ensure activity, facility, and institutional requirements and management expectations are met?
 - b. Are formal, rigorous, effective self-assessments conducted at all levels and in all organizations to determine the adequacy of programs and performance and identify deficiencies needing correction and areas and means for performance improvement?
 - c. Are institutional programs periodically evaluated for adequacy, including assessment of implementation by line and support organizations?
 - d. Are appropriate and effective independent assessments performed, including evaluations of assurance system effectiveness?
 - e. Is the subject, scope, and frequency of self- and independent assessments based on a formal analysis that addresses elements such as risk; regulatory or standards based requirements; type and complexity of work activities, facilities, and conditions; past performance; trend analyses; or management concerns?
 - f. Are planned assessments documented on an appropriate schedule that is maintained to reflect pertinent information and status (e.g., additions, completions, cancellations, and substitutions)?
 - g. Have subcontractors implemented appropriate and effective self-assessment programs, and is the contractor's subcontractor oversight program effectively evaluating performance, providing feedback to subcontractors, and ensuring correction of process and performance deficiencies?
 - h. Are assessment activities sufficiently performance-based, including an appropriate focus on observation of work, inspection of field conditions, review of evidence of compliant and effective performance, and effectiveness of corrective actions for previously identified deficient conditions?
 - i. Is the performance indicator program periodically reviewed to ensure the most appropriate sets of data and data analysis parameters are being employed?
 - j. Is performance data being sufficiently analyzed, with conclusions drawn and presented to management, and needed actions identified and taken?
 - k. Are the processes and performance of assessment and performance measurement programs evaluated for effectiveness on an appropriate frequency?

Contractor Event Reporting Lines of Inquiry

- 1. Oversight Program – Are the processes for event identification, reporting and investigation formal and documented and meet the requirements of DOE directives?

- a. Have appropriate, formal processes and procedures been established to detail the requirement for the identification, documentation, investigation, analysis, reporting, and management of issues for operational events (including non-reportable incidents), accidents, occupational injuries and illnesses, and quality assurance and nuclear safety issues?
 - b. Do processes require timely and appropriate identification, documentation, and local notification of operational events, incidents, accidents, occupational injuries and illnesses and nuclear safety issues?
2. Training & Qualification – Are personnel implementing event identification, reporting, and investigation processes adequately trained and qualified to perform assigned oversight activities (in accordance with DOE O 226.1A, DOE M 360.1-1B, and DOE M 426.1-1A)?
- a. Has the contractor defined the requirements for experience, knowledge, skills and abilities for personnel implementing event identification, reporting, and investigation activities?
 - b. Has the contractor provided and ensured completion of appropriate training for personnel implementing event, accident, occupational injury and illness, and nuclear safety issue management activities?
3. Implementation of Program Responsibilities – Are event identification, reporting and investigation responsibilities appropriately validated, documented, communicated, classified, evaluated, tracked and resolved?
- a. Is reporting of operational events, accidents, occupational injuries and illnesses, and nuclear safety issues conducted in accordance with applicable nuclear, security, environment, occupational safety and health, and quality assurance requirements, applicable DOE directives, and contract terms and conditions?
 - b. Are immediate and compensatory measures to operational events, accidents, occupational injuries and illnesses and nuclear safety issues sufficiently defined and taken as part of line management initial response to operational events, and in the development of follow-on corrective action plans?
 - c. Are operational events, accidents, occupational injuries and illnesses and nuclear safety issues promptly and rigorously reported to management, documented, and investigated in accordance with formal issues management processes that identify causes and recurrence controls, management and programmatic weaknesses, and the need to communicate lessons learned?
 - d. Are corrective and preventive actions resulting from investigation of events, accidents, and occupational injuries and illnesses formally managed to completion and effective in preventing recurrence?
 - e. Are events, accidents, occupational injuries and illnesses, and nuclear safety issues reported to DOE and other regulatory entities in a timely and thorough manner as required by directives and regulations?
 - f. Are operations and engineering organizations, including support organizations, appropriately involved in the identification, assessment, and development of corrective action plans of reportable events, accidents, and occupational injuries and illnesses?

- g. Are trending analyses of events (including non-reportable incidents), accidents, and occupational injuries and illnesses performed in accordance with structured/formal processes and applicable DOE directives?
- h. Are the processes and performance of event, accident, occupational injury and illness, and nuclear safety issue management properly evaluated for effectiveness on an appropriate frequency?

Contractor Operating Experience/Lessons Learned Lines of Inquiry

1. Oversight Program – Are the processes which constitute the operating experience/lessons learned program formal and documented and, when taken together, meet the requirements of DOE Order 226.1A and DOE Order 210.2, *DOE Corporate Operating Experience Program*?
 - a. Has the contractor established and implemented a formal program that screens lessons learned from external sources for local applicability and evaluates site conditions and processes to determine if actions are needed to apply applicable lessons learned and ensure that actions deemed necessary are implemented?
 - b. Has the contractor identified an institutional program coordinator and contacts/coordinators in line and support organizations?
 - c. Has the contractor established and implemented processes that identify, document, disseminate and apply lessons learned from investigations of incidents/accidents and occupational injuries, including near misses, and from work activities that warrant communication to other organizations?
 - d. Has the contractor established tools and services to encourage and facilitate the documentation and communication of lessons learned such as templates, guidance documents, and subject matter expert assistance?
 - e. Do work planning and training for design, construction, research, operations, and maintenance processes include triggers to prompt or record the research and application of potentially applicable lessons learned?
 - f. Has the contractor established tools that encourage and facilitate the research of lessons learned, such as a searchable database and links to external source sites?
2. Training & Qualification – Are personnel implementing operating experience/lessons learned processes adequately trained and qualified to perform assigned oversight activities (in accordance with DOE O 226.1A, DOE M 360.1-1B, and DOE M 426.1-1A)?
 - a. Has the contractor provided and ensured completion of appropriate training on the expectations, requirements, and processes for the development, identification, sharing, and application of lessons learned?
3. Implementation of Program Responsibilities – Are operating experience/lessons learned program responsibilities appropriately implemented?
 - a. Are appropriate sources of lessons learned being regularly and rigorously screened by the coordinator(s) and/or subject matter experts and line organizations for applicability and the need for action?

- b. Have work planners, supervisors, managers, subject matter experts, and training staff subscribed to the DOE lessons learned database?
- c. Are screening and technical review activities and results documented and tracked to demonstrate and manage program implementation?
- d. Is the disposition of process and performance deficiencies identified through lessons learned processes managed in accordance with the formal issues management and corrective action tracking system process(es)?
- e. Is lessons learned information readily available to potential users?
- f. Are innovative, successful practices shared as well as negative lessons learned?
- g. Are internally generated lessons learned evaluated for their potential value to other DOE facilities and shared with the DOE complex as appropriate?
- h. Are lessons from experiences within and outside the contractor organization effectively communicated and used in work planning and training?
- i. Do safety committees or other boards provide effective feedback, including reviewing performance, analyzing data for lessons learned, and assigning and formally tracking action items for improvement?
- j. Is contractor facility management collecting and disseminating to their staff both lessons learned and good practices from operational events related to their facilities and similar DOE facilities?
- k. Are internally identified lessons learned being reported to the DOE operating experience program for sharing with the DOE complex when appropriate?
- l. Have metrics to measure program performance, use, and effectiveness been established?
- m. Has the adequacy of the operating experience/lessons learned program been adequately assessed by the contractor on an appropriate frequency?

Contractor Issues Management Lines of Inquiry

- 1. Oversight Program – Are the processes that constitute the Contractor issues management program formal and documented and meet the requirements of DOE O 226.1A?
 - a. Have comprehensive processes and procedures been established and implemented that provide for the consistent, timely, and effective collection, analysis, and resolution of process and performance deficiencies and other issues, regardless of their source? Are separate processes and tracking tools compatible and sufficiently integrated to facilitate consistent implementation, trending, and performance measurement?
 - b. Does the issues management program include processes (including Occurrence Reporting and Processing System and Price-Anderson Amendments Act [PAAA]) and tools that address the following essential elements:
 - i. Determining risk, significance and priority?
 - ii. Evaluating the scope and extent of condition or deficiency?

- iii. Determining and ensuring reportability in accordance with DOE or regulatory requirements?
 - iv. Analyzing for root and contributing causes using a graded approach?
 - v. Development of effective corrective action plans that include recurrence controls that address identified root and contributing causes?
 - vi. Assigning and changing ownership of issues, action plan development, and corrective action implementation?
 - vii. Milestones for completion of corrective/preventive actions and requirements for revisions of milestone dates?
 - viii. Tracking of progress of actions?
 - ix. Verification that actions are complete?
 - x. Validation of the effectiveness of corrective/preventive actions using a graded approach?
 - xi. Ensuring that the status of issues management is communicated to management and individuals and organizations are held accountable for performing their assigned responsibilities for managing issues?
- c. Have formal policies and processes been established and communicated for rapidly determining if deficiencies or conditions pose immediate and/or significant risk of harm to workers, the public, or the environment and provide for interim actions such as stopping work, system shutdown, or other compensatory measures pending formal processing of the issue?
2. Training & Qualification – Are personnel implementing contractor issues management processes adequately trained and qualified to perform assigned oversight activities (in accordance with DOE O 226.1A, DOE M 360.1-1B, and DOE M 426.1-1A)?
- a. Has the contractor defined the requirements for experience, knowledge, skills and abilities for personnel implementing issues management activities?
 - b. Has the contractor provided and ensured completion of appropriate training for personnel implementing issues management activities?
3. Implementation of Program Responsibilities – Are contractor issues management program responsibilities appropriately implemented?
- a. Are issues (including lower level deficiencies) periodically formally analyzed collectively to identify adverse trends or areas of weakness that require corrective or preventive actions?
 - b. Are adverse trends and needed corrective actions formally documented and addressed using the formal issues management process?
 - c. Are the processes and performance for the issues management program properly evaluated for effectiveness on an appropriate frequency?

4. Program Effectiveness – Are the contractor issues management processes effective in ensuring that site operations are performed safely, securely, and in compliance with applicable requirements?
 - a. Are the above issues management program elements being effectively implemented?

Contractor Worker Feedback Lines of Inquiry

1. Oversight Program – Are the processes which constitute the contractor worker feedback programs formal and documented and, when taken together, meet the requirements of DOE directives?
 - a. Has an effective employee concerns program been established and implemented that encourages the reporting of employee concerns and provides thorough, documented investigations, with timely and effective corrective actions and recurrence controls that are tracked to completion?
 - b. Are confidentiality and anonymity protections and rights to appeal clearly communicated to employees and effectively implemented during the resolution of concerns?
 - c. Do site processes require/encourage formal reviews or documented feedback from performers and supervision after completion of maintenance, experimental activities, or operational evolutions?
 - d. Has an effective differing professional opinion process or program been established and implemented, in accordance with the Contractor Requirements Document associated with DOE M 442.1-1, *Differing Professional Opinions Manual*? Were DPOs appropriately supported?
2. Training & Qualification – Are personnel implementing Contractor Worker Feedback program processes adequately trained and qualified to perform assigned oversight activities (in accordance with DOE O 226.1A, DOE M 360.1-1B, and DOE M 426.1-1A)?
 - a. Has the contractor defined the requirements for experience, knowledge, skills and abilities for personnel implementing employee concerns and worker feedback activities?
 - b. Has the contractor provided and ensured completion of appropriate training for personnel implementing employee concerns, differing professional opinions, and worker feedback activities?
3. Implementation of Program Responsibilities – Are contractor employee concerns and worker feedback responsibilities appropriately implemented?
 - a. Are the mechanisms and processes for employees to (1) report and get resolution to safety concerns; and (2) report a differing professional opinion clearly communicated to employees through vehicles such as new employee and refresher training, posters, intranet sites?
 - b. Are worker feedback information, differing professional opinions, and safety concerns expressed by employees and the activities and supporting information for disposition of feedback and concerns formally documented/logged?

- c. Are investigations of employee concerns, differing professional opinions, and feedback information thoroughly performed without conflict of interest and with the involvement of technical expertise as appropriate?
- d. Is employee confidentiality maintained as requested and as detailed in program documents?
- e. Are corrective/preventive actions taken as a result of investigating employee concerns, differing professional opinions, and feedback processes appropriate and managed in a formal manner in accordance with contractor procedures?
- f. Are the resolutions of employee concerns and differing professional opinions communicated to concerned individuals with a solicitation of concurrence and identification of appeal mechanisms?
- g. Are the processes and performance for the employee concerns, differing professional opinions, and worker feedback programs formally and adequately evaluated for effectiveness on an appropriate frequency?