




Department of Energy

Washington, DC 20585

February 28, 1994

MEMORANDUM TO DISTRIBUTION

FROM: ARCHER L. DURHAM 
ASSISTANT SECRETARY FOR
HUMAN RESOURCES AND ADMINISTRATION

SUBJECT: INTERIM POLICY AND GUIDANCE DOCUMENT ON
DOE ROLES AND RESPONSIBILITIES FOR
EVALUATION OF TECHNICAL TRAINING AND
QUALIFICATION PROGRAMS AT DEFENSE
NUCLEAR FACILITIES

Attached is a copy of the interim policy and guidance document addressing the roles and responsibilities for evaluation of technical training and qualification programs at defense nuclear facilities. This document completes Commitment 1.4 of the Department's Implementation Plan responding to Defense Nuclear Facilities Safety Board Recommendation 93-3.

This document is issued as interim policy and guidance since these roles and responsibilities will eventually be incorporated in the Departmental Orders related to the training and qualification of both Management and Operating contractors, and Federal employees. The revision and/or development of these Orders is to be completed by the end of 1994.

Program and Operations Offices are to review this document for applicability and impact. Steps should be taken as necessary to comply with the policy. The Office of the Technical Personnel Program Coordinator (HR-1.5) is available to assist you in complying with these requirements. Should you require assistance, or have questions related to this document, please contact Tom Evans or Ray Hardwick at (202) 586-3558.



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**U.S. DEPARTMENT OF ENERGY
INTERIM
POLICY AND GUIDANCE**

**ROLES AND RESPONSIBILITIES RELATED TO EVALUATION OF
TECHNICAL TRAINING AND QUALIFICATION PROGRAMS
AT DEFENSE NUCLEAR FACILITIES**

FEBRUARY 1994

**U. S. DEPARTMENT OF ENERGY
INTERIM POLICY AND GUIDANCE**

**Roles and Responsibilities Related to Evaluation of Technical
Training and Qualification Programs at Defense Nuclear Facilities**

I. INTRODUCTION

In Recommendation 92-7 to the Secretary of Energy, the Defense Nuclear Facilities Safety Board (DNFSB) stated that "The contractor's lack of effective implementation of DOE Orders concerning training is indicative of the need for more emphasis, direction and guidance on training by line management at DOE Headquarters and Field Offices." They also stated that the Department should "assess the roles and effectiveness of technical oversight groups to ensure that these groups' reviews, at all organizational levels within the defense nuclear facilities complex, appropriately recognize the importance of training and qualification to public health and safety."

The Secretary of Energy approved the Department's Implementation Plan to respond to DNFSB Recommendations 92-7 and 93-3. That plan committed the Department to clearly defining the roles and responsibilities for DOE organizations providing management direction for, or evaluating, training and qualification activities. This document meets the intent of Commitment 1.4 in the Implementation Plan.

II. PURPOSE AND APPLICABILITY

The purpose of this document is to state the roles and responsibilities within DOE for the following functions:

1. Providing management direction and guidance to Management and Operating (M&O) contractors related to technical training and qualification program structure and implementation;
2. Evaluating contractor training and qualification programs by line management organizations and the Office of Environmental Safety and Health; and
3. Evaluating Federal employee technical training and qualification programs.

This interim policy and guidance applies to all DOE organizations and personnel (Headquarters and Field) in the defense nuclear facilities complex. This document does not describe or define how these activities are to be performed, or the training and qualification requirements for personnel performing the evaluations. The roles and responsibilities contained in this document will be included in that guidance, and applicable DOE Orders as they are developed or revised. This interim policy and guidance is valid until superseded by new or revised DOE Orders.

III. POLICY AND GUIDANCE

A. **Providing Management Direction and Guidance to M&O Contractors**

Most of the requirements and regulations related to training and qualification programs for M&O contractors are contained in Federal laws, State laws, and DOE Orders. Examples of these include Federal and State occupational safety and health regulations, environmental regulations, DOE security requirements, and DOE Order 5480.20 *Personnel Selection, Qualification, Training and Staffing Requirements at DOE Reactor and Non-Reactor Nuclear Facilities*. Additional guidance is also provided by the various DOE Standards pertaining to training and qualification.

Contractual guidance and direction to the M&O contractor should always be provided by the appropriate contracting officer or his or her designee. The direction may be stated in the contract document, award fee criteria, or in written direction from the contracting officer or designee. It is the Contracting Officers responsibility (with assistance from the DOE-HQ Program Offices) to establish the applicability of training and qualification requirements and clearly communicate them to the M&O contractor.

The following actions are necessary to ensure that M&O contractors have a clear understanding of the implementation of training and qualification requirements:

1. Each Operations Office Manager shall establish a written policy that clearly indicates by position, those personnel that are authorized to provide management direction and/or guidance to M&O contractors regarding implementation of training and qualification programs. The level of guidance and direction may vary within the Operations Office by program area and assigned responsibility. For example, DOE line management at a facility may have certain responsibilities where the Training Office may have a different level of responsibility. The policy should be provided to the M&O contractor.
2. All guidance and direction to the M&O contractor will be communicated from the Operations Office Manager, or his or her designee. Input from DOE -HQ Program Office personnel must be coordinated with, and communicated through, the Operations Office.
3. Any additions or revisions to existing training and qualification requirements contained in DOE Orders shall be reviewed and concurred with by the Operations Office Manager prior to implementation by the M&O contractor.

B. Evaluation of M&O Contractor Training and Qualification Programs

M&O contractor training and qualification programs shall be evaluated for compliance with requirements, effectiveness, and efficiency. The primary DOE Orders that presently address responsibilities for the evaluation of contractor training and qualification programs for defense nuclear facilities are DOE Order 5480.18A and DOE Order 5480.20. The responsibilities identified in those Orders are currently under revision. The purpose of this interim policy and guidance is to clarify and amplify the Department's role in implementing those requirements.

1. The Operations Office has the primary responsibility for evaluating the M&O contractor's training and qualification program(s) for compliance with Federal law, State law, DOE Orders, and other applicable regulations. This responsibility is carried out through functional appraisals and day-to-day evaluations. The Operations Office is also responsible for coordinating the interpretation of laws, regulations, and Orders for the contractor; through the appropriate source agency or organization.
2. DOE-HQ Program Offices may request copies of the results of functional appraisals and evaluations performed by the Operations Office. They may also perform evaluations of contractor training and qualification programs. All DOE-HQ Program Office evaluation activities (i.e., establishment of scope and criteria, contractor interface, reporting of results, and finding closeout) shall be coordinated with a designated Operations Office point of contact.
3. The Assistant Secretary for Environment, Safety and Health (EH) shall perform independent evaluations of M&O contractor training and qualification programs. Performance of independent evaluations by EH does not require the concurrence of the Operations Office Manager. However, independent EH evaluations should be coordinated with a designated Operations Office point of contact. Results of

these evaluations shall be transmitted to the appropriate Operations Office manager and DOE-HQ Program Office manager.

C. Evaluation of Federal Employee Technical Training and Qualification Programs

The formal requirements for DOE technical employee training and qualification programs are currently identified in DOE Order 5700.6C. Additional requirements are being formulated in response to DNFSB Recommendation 93-3. To ensure that programs are developed and implemented in accordance with these requirements, periodic evaluations shall be performed as follows:

1. Operations and Program Offices shall conduct periodic self-assessments of the Federal employee technical training and qualification programs within their cognizant area of responsibility.
2. The Human Resources (HR) organization shall conduct periodic self-assessments of the applicable portions of the Federal employee training program for which they are responsible for implementing. This includes the Department's new Energy Technical Training Center in Albuquerque, NM.
3. The Assistant Secretary for Environment, Safety and Health (EH) shall perform independent evaluations of Federal employee technical training and qualification programs. The evaluation shall be coordinated with the affected organization. The results of these evaluations shall be forwarded to the Operations or DOE-HQ Program Office being evaluated for appropriate action. Information copies of the results of the evaluations shall be forwarded to the Technical Personnel Program Coordinator (TPPC). The TPPC shall ensure that the Technical Excellence Executive Committee is kept informed of the results of the internal evaluations by EH.