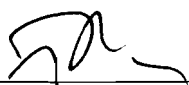
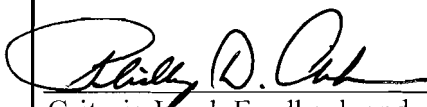


<p>U.S. Department of Energy</p> <p>Office of Independent Oversight</p> <p>Criteria Review and Approval Document</p>	<p>Subject: Feedback and Continuous Improvement Inspection Criteria and Approach – DOE Field Element</p> <p></p> <hr/> <p>Director, Office of ES&H Evaluations</p> <p>Date: 12/5/07</p> <p></p> <hr/> <p>Criteria Lead, Feedback and Continuous Improvement Inspection Criteria and Approach – DOE Field Element</p> <p>Date: 12/5/07</p>	<p>HS: HSS CRAD 64-21</p> <p>Rev: 0</p> <p>Eff. Date: 12/04/2007</p> <p>Page 1 of 18</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 Site Office Inspection Criteria, Activities and Lines of Inquiry

DOE Field Element Line Management Oversight Inspection Criteria - DOE field element line management has established and implemented effective oversight processes that evaluate the adequacy and effectiveness of contractor assurance systems and DOE oversight processes. DOE field element 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 2; quality assurance requirements (as stated in 10 CFR 830, Subpart A, or other applicable regulations); and applicable DOE directives.

1. DOE field element line management has established a baseline line management oversight program that ensures that line management maintains sufficient knowledge of site and contractor activities to make informed decisions concerning hazards, risks and resource allocation, provide direction to contractors, and evaluate contractor performance.
2. DOE field element line oversight program includes assessments, operational awareness activities, performance monitoring and improvement, and assessment of contractor assurance systems. Documented program plans have been established that define oversight program activities and annual schedules of planned assessments and focus areas for operational awareness. Operational awareness activities must be documented either individually or in periodic (e.g., weekly or monthly) summaries. Deficiencies in programs or performance identified during operational awareness activities must be communicated to the contractor for resolution through a structured issues management process.
3. Oversight must include structured and rigorous processes for validating the accuracy of information collected during assessments. DOE field element line management requires that findings must be tracked and resolved through structured and formal processes, including provisions for review of corrective action plans.
4. DOE field element line management must regularly assess the effectiveness of contractor issues management and corrective action processes, lessons learned processes, and other feedback mechanisms (e.g., worker feedback). DOE field element line management must also evaluate contractor processes for communicating information, including dissenting opinions, up the management chain.
5. DOE field elements regularly assess the effectiveness of DOE-wide lessons learned processes to improve all work processes (e.g., safety, and security) and associated management systems.
6. DOE field element line management must verify that corrective actions are complete and performed in accordance with requirements before findings identified by DOE assessments or reviews are closed, and requires that deficiencies are analyzed both individually and collectively to identify causes and prevent recurrences.
7. DOE field element line management has established appropriate criteria for determining the effectiveness of site programs, management systems, and contractor assurance systems, and

includes consideration of previous assessment results, effectiveness of corrective actions and self-assessments, and evidence of sustained management support for site programs and management and assurance systems. Review criteria are based on requirements and performance objectives (e.g., laws, regulations, and DOE directives), site-specific procedures/manuals, and other contractually mandated requirements and performance objectives.

8. DOE field element line management regularly assesses site assurance systems to determine the appropriate level of overlap and redundancy of DOE Headquarters and field element oversight. The effectiveness of the contractor assurance system, the hazards at the site/activity, and the degree of risk are factors in determining the scope and frequency of DOE field element line management oversight activities.
9. DOE field element line management has established and maintained appropriate qualification standards for personnel with oversight responsibilities and a clear, unambiguous line of authority and responsibility for oversight.
10. DOE field element line management has established and implemented formal processes for ensuring requirements and performance expectations are established and communicated through formal contractual mechanisms to the contractor. Performance expectations are established through the development and approval of required program documents such as quality assurance program (QAP), integrated system management (ISM), integrated safeguards and security management (ISSM), etc. Line management periodically reviews established performance measures to ensure performance objectives and criteria are challenging and focused on improving performance in known areas of weakness.
11. DOE field element line management has established effective processes for communicating line oversight results and other issues up the DOE line management chain, using a graded approach based on the hazards and risks. Established processes provide sufficient technical information to allow informed decision-making by line managers, and include provisions for communicating and documenting dissenting opinions. Formal structured processes for resolving disputes for oversight findings and other significant issues have been implemented, and include provisions for independent technical reviews for significant findings.
12. DOE field element line management reviews and approves contractor assurance system program descriptions updates (if formally delegated, otherwise reviews and forwards to Headquarters for approval).
13. DOE field element initially approves and, thereafter, annually reviews and approves integrated safety management system description updates (if formally delegated, otherwise reviews and forwards to Headquarters for approval).
14. DOE field element line management monitors contractor performance and assesses whether performance expectations are met; that contractors are assessing site activities adequately; self-identifying deficiencies; and taking timely and effective corrective actions. Responsibilities for line oversight and self-assessment are assigned and managers, supervisors, and workers are held accountable for performance assurance activities. Deficiencies must be brought to the attention of contractor management and addressed in a timely manner.

15. DOE field elements must have a structured, documented self-assessment program for environment, safety, and health; safeguards and security; cyber security; and emergency management. DOE field elements must perform self-assessments of programmatic and line management oversight processes and activities (e.g., security surveys, facility representative programs, personnel qualification standards, and training programs) to assess whether requirements and management expectations are met. Continuous improvement mechanisms (e.g., corrective action processes) must be in place to improve the effectiveness and efficiency of oversight programs and site operations.
16. An effective employee concerns program been established and implemented in accordance with DOE O 442.1A, *DOE Employee Concerns Program*, that encourages the reporting of employee concerns and provides thorough investigations and effective corrective actions and recurrence controls.
17. An effective, differing professional opinion process or program has been established and implemented, in accordance with DOE M 442.1-1, *Differing Professional Opinions Manual*.

DOE Field Element Operating Experience/Lessons Learned Program Inspection Criteria – Field elements are to implement Lessons Learned (LL) program roles and responsibilities as identified in DOE O 210.2, *DOE Corporate Operating Experience Program*. Specified criteria include:

1. Ensure that field element processes incorporate lessons learned into training, maintenance and work planning, work processes, operations, and design and construction.
2. Designate operating experience program coordinators to fulfill the responsibilities assigned by this Order.
3. Ensure that quarterly analyses of reportable and non-reportable events submitted by contractors and program field elements in accordance with Section 5.8 of DOE M 231.1-2, *Occurrence Reporting and Processing of Operations Information*, dated 8-19-03, are reviewed to identify operating experience trends and lessons learned.
4. Ensure that operating experience reports are implemented by the field element and contractor organizations through line management oversight.
5. As a part of self-assessments conducted to evaluate organizational performance in Integrated Safety Management (ISM), includes an assessment of the effectiveness of the organization's operating experience program.
6. Review contractor implementation of local operating experience programs.
7. Screen contractor-developed operating experience information to ensure operational awareness.
8. Monitor contractor performance and sharing of lessons learned.
9. Share contractor performance information with the Program Secretarial Officers (PSOs)/ National Nuclear Security Administration (NNSA) Deputy Administrators.
10. Recommend locally developed lessons learned for inclusion in the DOE Corporate Lessons Learned Database (URL: <http://www.eh.doe.gov/DOEll/index.asp>).

11. Forward lessons learned applicable to specific missions or programs to the appropriate PSO/NNSA Deputy Administrator for consideration.
12. Ensure that senior contractor management is held accountable for recurrence of significant adverse events.
13. Ensure that operating experiences and lessons learned from departing contractors are shared with new contractors following awarding of major contracts.
14. Share operating experience lessons learned with the DOE complex through the DOE Corporate Lessons Learned Database (URL:<http://www.eh.doe.gov/DOE11/index.asp>).
15. Provide to the appropriate PSO or NNSA Deputy Administrator feedback concerning reviews conducted and actions taken for Special Operations Report (SOR) and Environment, Safety and Health Alert (SA) operating experience documents.

DOE Field Element Facility Representative Program Inspection Criteria - The following Criteria are designed to examine the strength and maturity of the Field Element's Facility Representative Program and the effectiveness of its Facility Representatives by assessing performance at meeting the five objectives of the Facility Representative Program (in accordance with DOE O 5480.19, *Conduct of Operations for DOE Facilities*, and DOE-STD-1063-2006, *Facility Representatives*).

1. Facility Representatives (FR) are well trained and qualified to perform their assigned duties.
2. There is adequate Facility Representative coverage for DOE facilities.
3. Facility Representatives provide effective oversight of facilities.
4. The Facility Representative Program receives adequate functional support from Field Element Management.
5. Performance assessment and feedback programs are in place.

DOE Field Element Review Approach: Review appropriate oversight directives, policies, program descriptions, procedures, instructions, and guidance. Review operational awareness and assessment activity planning documents and schedules. Review operational awareness data and assessment reports for adequacy in selected areas. Interview DOE managers and staff to determine how assessments are planned and performed and how they are used to improve performance. Review documentation related to deficiencies (e.g., procedures, completed assessments, employee concern case files, 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. Review training and qualification records and interview personnel to determine the adequacy in establishing and enhancing competence of oversight personnel. Review the LL program description documents and products and interview personnel (managers, LL Coordinator, etc.) to determine adequacy of implementation and continuous improvement of the field element LL program. Review FR program process descriptions and implementing procedures (i.e., training & qualification; performance indicators; occurrence reporting; and logs and reports). Interview personnel associated with the FR program (i.e., program sponsors; FRs;

FR supervisors; line managers; contractor facility managers; subject matter experts (health physics, explosive safety, etc). As time allows, conduct walkthroughs or surveillances with FRs. Review Differing Professional Opinion implementing processes or procedures. Interview personnel processing Differing Professional Opinions, and verify their clear understanding of assigned roles, and responsibilities. Collect and review an appropriate sample of Differing Professional Opinions (if any have been processed since the last Independent Oversight inspection).

DOE Field Element Oversight Program Lines of Inquiry - Are the DOE field element line management oversight programs, plans, processes and schedules compliant with DOE O 226.1A, coordinated, documented, risk informed and historically aware, while ensuring significant deficiencies are identified, documented, communicated, evaluated, tracked and appropriately resolved?

1. Are the roles, responsibilities, and authorities for quality assurance documented in DOE field element Quality Assurance Plans in accordance with DOE Order 414.1C, *Quality Assurance*?
2. Are responsibilities for implementing field element line oversight and self-assessment plans formally assigned and documented?
3. Are the requirements of the Headquarters QAP reflected in a site-level QAP?
4. Has DOE field element line management established and communicated appropriate criteria for determining the effectiveness of DOE field element and contractor programs, management systems, and assurance systems?
 - a. Do the criteria include consideration of previous assessment results; effectiveness of corrective actions and self-assessments; and evidence of sustained management support for site programs, management, and assurance systems?
 - b. Is the criteria based on requirements and performance objectives relevant to the site and site mission (e.g., laws, regulations, national standards, DOE directives, DOE-approved plans and program documents, site-specific procedures/manuals, and criteria review and approach documents), DOE procedures/manuals, and other performance objectives, including those required for:
 - i) Authorization Basis;
 - ii) Quality Assurance;
 - iii) Integrated Safety Management (including the environmental management system);
 - iv) Integrated Safeguards and Security Management;
 - v) Cyber Security;
 - vi) Emergency Management;
 - vii) Self assessments; and,
 - viii) Contractually mandated requirements, including performance indicators, measures, objectives, and criteria?

5. Do DOE field element line management oversight programs include effective processes for performance assessment and monitoring of the scope and implementation of contractor activities, management programs and assurance systems, including:
 - a. Operational Awareness Activities, the majority of which are performed by the DOE field element that include:
 - b. Routine day-to-day monitoring of work performance through facility tours/walk-throughs, work observations, document reviews, meeting attendance and participation, and ongoing interaction with contractor workers, support staff, and management;
 - c. Rigorous review and critique of contractor processes and performance in identifying, evaluating, and reporting events and safety issues that are required to be reported by laws, regulations, or DOE directives to determine whether issues are properly screened, evaluated, and reported;
 - d. Evaluation and monitoring of the contractor evaluations and corrective actions for events and issues and assesses whether effective recurrence controls are identified and implemented;
 - e. Documentation of operational awareness activities either individually or in periodic (e.g., weekly or monthly) summaries.
6. Assessments of Facilities, Operations, and Programs to ensure contractor compliance with requirements that include:
 - a. Planned and scheduled assessments of effectiveness based on DOE and external requirements, analysis of hazards and risks, past performance, and effectiveness of contractor assurance systems for organizations, facilities, operations, and programs;
 - b. “For cause” reviews in addition to scheduled assessments when circumstances warrant (e.g., when events indicate degradation of a system);
 - c. Assessments in support of facility startup and restart, and review and approval of required program documents (e.g., authorization basis documents);
 - d. Assessments of the site qualification standard programs, training programs, and individual training and qualifications as they relate to environment, safety, and health: safeguards and security; emergency management; and cyber security.
7. Assessments of the adequacy of the contractor assurance system that include:
 - a. Verification that the contractor assurance systems address all organizations, facilities, and program elements.
 - b. Assessments of implementation and effectiveness of contractor assurance systems for environment, safety, and health; safeguards and security; emergency management; and cyber security; and their sub-elements (e.g., radiation protection within environment, safety, and health) by examining the following:
 - i) assessment methods (e.g., whether sufficient emphasis is placed on observation of work activities);
 - ii) the frequency, breadth, and depth of self-assessments;
 - iii) line management involvement in self-assessments;

- iv) evaluators' technical expertise and qualifications;
 - v) the number and nature of findings identified; and
 - vi) the degree of rigor applied to self-assessment.
- c. Regular assessments of the effectiveness of contractor issues management and corrective action processes, lessons learned processes, and other feedback mechanisms (e.g., worker feedback).
 - d. Evaluation of contractor processes for communicating information, including dissenting opinions, up the management chain.
 - e. Verification that contractor corrective actions have been implemented and are effective in resolving deficiencies and preventing recurrence.
 - f. Regular assessments of the contractor's reporting processes and performance to confirm that contractors meet reporting requirements for events and incidents of security environment, safety, health, cyber security, and emergency management concern and take effective actions to prevent recurrence of deficiencies or findings; and
 - g. For sites where contractors report the results of performance measures to DOE (e.g., as part of a contractual provision), regular assessments of the effectiveness of processes for collecting, evaluating, and reporting performance data to ascertain the accuracy, completeness, and validity of the performance measures.
8. Evaluations of contractor performance to ensure provisions of the contract are met, that include:
- a. Periodic evaluation of the effectiveness of contractor management programs, including environment, safety, and health; safeguards and security; cyber security; and, emergency management. Poor performance in these areas must have significant negative consequences on evaluations and fee determination. In accordance with contract provisions, evaluations must be used to reward significant accomplishments and/or performance improvements.
 - b. Evaluations that are based on an analysis of the results of relevant information obtained or developed during the performance period, including contractual performance measures and objectives, DOE line management oversight, contractor self-assessments, operational history/events, and reviews by DOE and external organizations.
 - c. Evaluations using the results of quantitative performance indicators and measures may be considered if assessed in combination with other assessment results in recognition that such indicators provide only a partial indication of system.
9. Do the DOE field element line management oversight programs and processes described above for performance assessment and monitoring of the scope and implementation of the contractor's programs and activities require:
- a. Determination of the overall scope, content, and frequency of assessments included in the coordinated DOE Headquarters and field element line management oversight program to be based on the assessed effectiveness of DOE line management and contractor assurance systems, the hazards at the site/activity, and the degree of risk involved;

- b. Establishment and implementation of a minimum DOE line management baseline oversight program (which includes planned, coordinated and scheduled assessments by DOE Headquarters and/or field elements) that focuses resources on selected assessments, operational awareness activities, performance measure monitoring and improvement, and assessment of assurance systems to enable DOE line management to understand the hazards and risks of activities;
 - c. Increasing oversight activity frequency and/or depth based on performance deficiencies or events, or decreasing frequency and/or depth to reflect sustained effective site performance;
 - d. Conducting more frequent assessments focusing on areas needing improvement in site programs, management systems, or assurance systems (e.g., insufficient rigor or comprehensiveness in existing systems);
 - e. Conducting, as appropriate, “for cause” reviews, reviews pursuant to other requirements in this Order, discretionary assessments, or for support to field elements during assessments;
 - f. Coordination of assessment activities with site assurance system activities to promote efficient use of resources while maintaining an adequate baseline oversight program that includes sufficient standalone assessments of contractor management and assurance systems and site programs;
 - g. Regular assessment of site assurance systems to determine the appropriate level of overlap and redundancy of DOE field element line management oversight;
 - h. Consideration of the results of external organization reviews and the effectiveness of assurance systems in determining DOE line management oversight priorities and the scope and frequency of oversight activities, while still implementing the defined minimum baseline oversight process;
 - i. Maintaining a balance between reviews of documentation (e.g., plans, procedures, and records) and adequacy of implementation through performance tests and observation of actual work activities at the facilities; and
 - j. Maintaining a similar balance between evaluations of systems (such as the DOE integrated safety management system and integrated safeguards and security management system), programs (e.g., radiation protection), facilities, and implementation of individual elements of those systems (e.g., specific work activities)?
10. Do DOE field element line management oversight programs require monitoring and self-assessment of DOE field element line management programs and activities, including requirements for:
- a. A structured, documented self-assessment program to confirm compliance with DOE requirements for environment, safety, and health; safeguards and security; cyber security; and emergency management.
 - b. Establishment and implementation of oversight processes for monitoring and ensuring continuous improvement in internal operations and required activities, such as reviewing and approving safety analysis reports and security plans, performing emergency management functions, adjudicating security clearances, implementing computer security

- programs at DOE office buildings, operating classified and sensitive information identification and protection programs, and operating employee concerns programs and other such functions?
- c. Performance of self-assessments of programmatic and line management oversight processes and activities (e.g., security surveys, facility representative programs, personnel qualification standards, and training programs) to assess whether requirements and management expectations are met.
 - d. Adjusting the frequency of assessments to be commensurate with the hazards and risks related to the activity being assessed. Continuous improvement mechanisms (e.g., corrective action processes) must be in place to improve the effectiveness and efficiency of oversight programs and site operations.
11. Do DOE field element line management oversight programs and processes require results of oversight activities to be appropriately validated, documented, communicated, classified, evaluated, tracked and resolved?
- a. Are structured and rigorous processes required for validating the accuracy of information collected during assessments?
 - b. Are deficiencies in programs or performance identified during assessment activities required to be communicated to appropriate managers for resolution through a structured issues management process?
 - c. Are dissenting opinions required to be documented and appropriately communicated with assessment results?
 - d. Are processes for resolution of disputes about oversight findings and other significant issues established, including where necessary, approved processes for interpretation of requirements?
 - e. Are effective processes established for independent technical reviews of significant issues?
 - f. Are effective processes established for communicating line management oversight results and other issues up and down the DOE line management chain (e.g., ES&H communications in accordance with DOE P 450.7), using a graded approach based on the hazards and risk?
 - g. Are findings required to be tracked and resolved through structured and formal processes, including provisions for review of corrective action plans?
 - h. Is DOE line management required to verify that corrective actions are complete and performed in accordance with requirements before findings identified by DOE assessments or reviews are closed?
 - i. Are deficiencies required to be analyzed both individually and collectively to identify causes and prevent recurrences?
12. Are DOE field element line management oversight programs and the annual schedule of planned assessments and focus areas documented and approved?

13. Do DOE field element line management oversight programs define the process for modifications of the annual oversight activity schedule and for DOE line management approval in response to changing circumstances?
14. Has an effective differing professional opinion process or program been established and implemented, in accordance with DOE M 442.1-1, *Differing Professional Opinions Manual*? Were differing professional opinions appropriately supported?
15. Has an effective employee concerns program been established and implemented that encourages the reporting of employee concerns and provides thorough investigations and effective corrective actions and recurrence controls (in accordance with DOE O 226.1A and DOE O 442.1A)?
 - a. Has the organization established and implemented documented program plans to implement program requirements?
 - b. Has order required organizational Employee Concerns Program (ECP) training been conducted?
 - c. Has an appropriate 24-hour ECP hotline been established and been advertised (i.e., posters, website, etc.)?
 - d. Have concerns been properly documented, investigated, and closed-out as required?
 - e. Are “independence of investigations” and “Concerned Individual confidentiality” addressed and appropriately executed?
 - f. If any were reported, were concerns that involved an imminent danger or condition or a serious condition immediately reported to competent authority, as appropriate?
 - g. Have appropriate offices (i.e., those with program, project, or health and safety responsibility) determined whether actions are needed to minimize, correct, or prevent recurrence of program, process, or management weaknesses that were identified and substantiated through the ECP?
 - h. Are controls in place to appropriately address classified information handled by the ECP?
 - i. Are records retained as required? Is sensitive information and confidentiality protected?
 - j. Are quarterly and annual reports developed, reviewed, and forwarded as required?
 - k. Have personnel responsible for implementing the ECP or investigating concerns been trained to properly carry out their responsibilities (e.g., training on the identification and classification of health and safety issues, how to investigate workplace, and administrative issues and dispute resolution techniques)?
 - l. Has the ECP manager assessed, at least annually, the effectiveness of the ECP and processes used to implement the Order?
 - m. Are transfers or referrals of concerns handled appropriately, as defined in implementing processes or procedures?
 - n. Are contractors required to have ECPs? Is appropriate oversight conducted?
16. Are continuous improvement mechanisms (e.g., corrective action processes) in place to improve the effectiveness and efficiency of oversight programs and site operations?

17. If DOE Headquarters and field element line management oversight processes are implemented as written, would DOE Headquarters and field element line management maintain sufficient knowledge of site and contractor activities to make informed decisions about hazards, risks and resource allocation, provide direction to contractors, and evaluate contractor performance?

DOE Field Element Training & Qualification Lines of Inquiry – Are DOE field element staff 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)?

1. Has DOE line management defined the requirements for experience, knowledge, skills, and abilities for personnel implementing the assurance system elements?
2. Has DOE line management established, maintained, and implemented appropriate qualification standards for personnel with oversight responsibilities?
3. Has DOE line management provided and ensured completion of appropriate training for personnel implementing the DOE field element line management assurance system elements?

DOE Field Element Implementation of Program Responsibilities Lines of Inquiry– Does DOE field element line management maintain sufficient knowledge of contractor programs and activities to make informed decisions about hazards, risks and resource allocation, to efficiently evaluate contractor performance, and to provide direction?

1. Were the following assessments required by DOE O 226.1A performed; what were the results; how were the insights used; and how effective were the corrective actions?
 - a. Do DOE field element line management personnel regularly review the results of DOE Headquarters and contractor oversight activities to maintain awareness of site conditions and trends and to determine the effectiveness of DOE line management oversight processes?
 - b. Does DOE field element line management periodically review established performance measures to ensure performance objectives and criteria are challenging and focused on improving performance in known areas of weakness?
 - c. Does DOE field element line management (unless not formally delegated) annually review and approve contractor assurance system program descriptions updates?
 - d. Does DOE field element initially approve and, thereafter, annually review and approve integrated safety management system description updates, unless approval authority is not delegated to the DOE field element?
 - e. Does DOE field element management regularly assess whether field elements are assessing site activities adequately; self-identifying deficiencies; and taking timely and effective corrective actions?
 - f. Does DOE field element line management regularly assess the effectiveness of field element issues management and corrective action processes, lessons learned processes, and other feedback mechanisms (e.g., worker feedback)?

- g. Does DOE field element line management evaluate field element processes for communicating information, including dissenting opinions, up the management chain?
 - h. Does DOE field element line management regularly assess field element assurance systems to determine the appropriate level of overlap and redundancy with DOE headquarters and contractor assessment activities?
 - i. Are the effectiveness of the site assurance system; the hazards at the site/activity; and the degree of risk factors in determining the scope and frequency of the combined DOE Headquarters and field element line management oversight program assessment activities?
 - j. Do DOE organizations perform self-assessments of programmatic and line management oversight processes and activities (e.g., security surveys, personnel qualification standards, and training programs) to assess whether requirements and management expectations are met and to identify opportunities for improvement?
 - k. Are continuous improvement mechanisms (e.g., corrective action processes) in place to improve the effectiveness and efficiency of oversight programs and site operations?
 - l. Does the Central Technical Authorities periodically monitor, participate in, and review the results of field oversight organization oversight and other information for high consequence nuclear operations to maintain operational awareness and to ensure the Department's nuclear safety policies and requirements are adequate and properly maintained?
2. Are managers, supervisors, and workers held accountable for assigned performance assurance responsibilities?
 3. Are oversight program responsibilities appropriately implemented?
 4. Are the coordinated DOE Headquarters and field element line management oversight programs effective in ensuring that site operations are performed safely, securely, and in compliance with applicable requirements?

DOE Field Element Oversight Results and Corrective Action Process Lines of Inquiry –

Are the results of oversight activities appropriately validated, documented, communicated, classified, evaluated, tracked and resolved?

1. Are structured and rigorous processes used for validating the accuracy of information collected during assessments?
2. Are deficiencies in programs or performance identified during assessment activities communicated to appropriate management for resolution through a structured issues management process?
3. Are these deficiencies appropriately addressed in a timely manner?
4. Does DOE line management have effective processes for communicating line oversight results and other issues up and down the management chain?
5. Do the DOE line management oversight processes provide sufficient technical basis to allow senior DOE managers to make informed decisions?

6. Are findings tracked and resolved through structured and formal processes, including provisions for review of corrective action plans?
7. Does DOE line management verify that corrective actions are complete and performed in accordance with requirements before findings identified by DOE assessments or reviews are closed?
8. Are deficiencies analyzed both individually and collectively to identify causes and prevent recurrences?

DOE Field Element Lessons Learned Program Lines of Inquiry - Has the field element implemented a Lesson Learned process in accordance with the requirements of DOE O 210.2, *DOE Corporate Operating Experience Program*?

1. Are field element LL roles and responsibilities fully described in a formal program description document?
2. Has a LL Coordinator been designated for the organization?
3. Does the field element process cause the incorporation of lessons learned into training, maintenance and work planning, work processes, operations, and design and construction?
4. Are quarterly analyses of reportable and non-reportable ORPS data being reviewed, to identify operating experience trends and lessons learned?
5. Are adequate technical resources being provided to develop, review, comment and/or concur on lessons learned (SORs, SAs, Environment, Safety and Health Bulletins, etc.).
6. Do line management oversight assessments contain specific criteria for inclusion of lessons learned in site office procedures, training, and other processes as appropriate?
7. Does field element self-assessment of integrated safety management evaluate effectiveness of the organizations operating experience program?
8. Does the field element periodically review the contractor operating experience program?
9. Is contractor-developed operational experience reviewed for operational awareness?
10. Does the field element routinely share operating experience data with headquarters?
11. Does the field element ensure that the contractor is held accountable for recurrence of significant adverse events?
12. Are locally developed lessons learned recommended for inclusion in the DOE Corporate Lessons Learned Database?
13. Does the field element provide feedback to the appropriate headquarters organization concerning reviews conducted and actions taken for SOR and SA operating experience documents?

DOE Field Element Facility Representative (FR) Program Lines of Inquiry - Has the field element implemented an effective FR Program? [References from DOE-STD-1063-2006, *Facility Representatives*]

1. Facility Representatives are well trained and qualified to perform their assigned duties.
 - a. Do training records demonstrate 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? [Sections 5.4 and 5.5]
 - b. Do Field Element Managers qualify Facility Representatives? [Section 5.5]
 - c. Do the training records show that Facility Representatives complete all re-qualification requirements at the periodicity specified in the program directive? [Section 5.5.6]
 - d. Are exceptions/extensions for re-qualification intervals properly documented and approved? [Section 5.5.6]
 - e. Are the qualifying officials involved in the qualification of Facility Representatives formally identified? [Sections 5.5.1 and 5.5.8]
 - f. Is the process used to ensure that qualified Facility Representatives maintain or regain proficiency formally defined and effective? [Section 5.5.7]
 - g. If Facility Representatives have failed to qualify or re-qualify within the time allowed, what actions were taken by the responsible Field Element Manager? [Section 5.5.8.d]
 - h. Does the examination process challenge the candidate sufficiently to verify the proper level of knowledge of all qualification areas and facilities? Do they test the Facility Representative's technical understanding of facility processes, judgment and decision-making abilities, and ability to communicate expectations to the contractor? [Section 5.5.8]
 - i. How well does the Facility Representative understand his/her roles and responsibilities under the Field Element's Facility Representative Program? [Section 4.1]
 - j. How well does Facility Representative continuing training provide hazard-related and activity-related information to Facility Representatives? [Appendix D]
2. There is adequate Facility Representative coverage for DOE facilities.
 - a. Is the Facility Representative staffing analysis performed in accordance with this standard and are Facility Representatives staffed to the indicated level? [Sections 5.1 and Appendix C]
 - b. Are sufficient numbers of Facility Representative candidates undergoing qualification to fill known or projected Facility Representative vacancies? If not, what is being done to correct the situation? [Section 5.1]
 - c. How long have current Facility Representative vacancies existed? [Section 5.1]
 - d. What is the trend of the reported time spent in the field and time performing oversight? [Section 5.8.1 and Appendix A]
 - e. What methods are used by the Field Element Manager to ensure that adequate facility coverage is maintained by qualified Facility Representative during periods of leave? [Section 5.1]

3. Facility Representatives provide effective oversight of facilities.
 - a. Has Facility Representative unencumbered access and “Stop Work” authority in their assigned facilities been adequately implemented? [Section 4.1.7]
 - b. Has “Stop Work” authority been exercised? Was it appropriate? Was it effective? Are there occasions when it was appropriate for Facility Representatives to exercise “Stop Work” authority, but it was not used? [Section 4.1.7]
 - c. What is the effectiveness of the Facility Representatives as verified by observing selected qualified personnel who are monitoring training, operations, or maintenance evolutions? [Section 4.1]
 - d. Based on a sample of occurrence reports, are Facility Representative reviews of the occurrence reports accomplished in a timely manner while insuring that the root cause has been determined and effective action proposed? [DOE M 231.1-2 Section 5.6.c]
 - e. Do Facility Representatives accomplish facility assessments, surveillances and audits as scheduled and are the findings meaningful and consistent with facility performance? [Sections 4.1 and 5.2]
 - f. Have Facility Representatives documented operational awareness entries regularly, and in accordance with implementing procedures? [Section 4.1.1 and 5.2.a]
 - g. Based on a sample of deficiencies identified by Facility Representatives during reviews, have Facility Representatives evaluated the overall effectiveness of the operating contractor in implementing corrective actions? [Sections 4.1.5 and 4.1.10]
 - h. Has the Field Element Manager implemented a process to track identified issues or discrepancies to satisfactory closure? [Sections 4.1.5, 4.1.10, and 4.2.4]
 - i. How adequate is the documentation of Facility Representative activities (e.g., reports, log keeping)? [Section 4.1.10]
 - j. How are Facility Representative findings reported (formally and informally) to the contractor? Are the reports provided to the contractor consistent with the information recorded by the Facility Representatives? How clear is the process of reporting findings to the contractor? [Section 4.1.10]
 - k. Does the Facility Representative have access to and communicate effectively with all levels of contractor management? [Section 4.1.10]
 - l. Are the Facility Representative interactions with the operating contractor effective in meeting the shared goals of safe and efficient facility operations? [Section 4.1.10]
4. The Facility Representative Program receives adequate functional support from Field Element management.
 - a. What are the reasons for any Facility Representative attrition? Are Facility Representatives leaving for promotions, laterals, downsizing? Have steps been taken to counter excessive attrition? [Section 5.1 and Appendix A]
 - b. What steps has management taken to ensure that the Facility Representative positions are career enhancing? Are there senior or supervisory Facility Representative opportunities available? [Section 4.2.4]

- c. What continuing training, professional certifications, graduate studies, or similar development activities are actively supported? [Section 5.7]
 - d. What role does Field Element management have in the qualification process? [Sections 4.2.4 and 5.5]
 - e. Does management provide the resources necessary to qualify Facility Representatives within a defined schedule? [DOEM 426.1-1A Chapter III, Paragraph 4.b]
 - f. How does line management support the actions taken by the Facility Representatives at the respective facilities? [Section 4.1.8]
 - g. What is the interface relationship between the Facility Representatives and each level of DOE line management? [Section 4.1.8]
 - h. Do Facility Representatives periodically meet with senior line managers within the field element to provide information related to the assigned facilities? [Section 4.2.4]
 - i. How does DOE line management track and follow up on issues raised by the Facility Representatives? [Section 4.1.10]
 - j. What process does DOE management use to address differing professional opinions and has it been used effectively? [Section 5.9]
 - k. What local processes exist to allow Facility Representatives access to Field Element technical expertise regarding contractor issues? [Section 4.1.9]
 - l. What Performance Indicator data is used to provide indication of the Facility Representative program status? What trending and analysis is done on Performance Indicator data? How is this information used? [Section 5.8.1 and Appendix A]
 - m. What incentive programs are in place and used effectively for the Facility Representative position? [Section 5.7.6]
 - n. Do these programs make the Facility Representative position desirable and career enhancing? [Section 5.7.6]
5. Performance assessment and feedback programs are in place.
- a. How often does the Field Element conduct self-assessments of the entire Facility Representative program? [Section 5.8.2]
 - b. Are peer reviews incorporated into the self-assessment process? [Section 5.8.3]
 - c. How does the Cognizant Secretarial Officer ensure that program performance assessments are accomplished, and any indicated corrective actions are completed? Mechanisms could include providing a representative to participate in assessments. [Section 4.2.3]
 - d. How well does the self-assessment program ensure that the evaluators have adequate knowledge and experience to conduct meaningful reviews? Based on self-assessment reports, have adequate reviews been conducted to be able to properly evaluate the assigned area of assessment and have the self-assessments generated meaningful recommendations for improvement and corrective actions? [Section 5.8.2 and Appendix B]

- e. Did the Field Element Manager pursue improvements to the Facility Representative program resulting from self-assessments of the program? [Sections 4.2.4 and 5.8]
- f. How are the Facility Representatives kept informed on changes to their facilities and their operating practices? [Section 5.4.4 and 5.5.6]
- g. How are lessons learned from facility events disseminated to Facility Representatives? [Section 5.5.6 and Appendix D]
- h. How are applicable lessons learned from facility events at other DOE facilities sought and disseminated to Facility Representatives? [Sections 5.8.4 and Appendix D]