



OFFICE OF ENFORCEMENT AND OVERSIGHT  
INDEPENDENT OVERSIGHT PROGRAM  
APPRAISAL PROCESS PROTOCOLS

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## Preface

The Office of Enforcement and Oversight, within the Office of Health, Safety and Security (HSS), is responsible for implementing an Independent Oversight Program for safety and security within the U.S. Department of Energy (DOE) in accordance with DOE Orders 227.1, *Independent Oversight Program*, and 226.1B, *Implementation of Department of Energy Oversight Policy*. Effective oversight, including independent oversight, of DOE Federal and contractor operations is an integral element of the Department's responsibility as a self-regulating agency to provide assurance of its safety and security posture to its leadership, its workers, and the public.

DOE Order 227.1 identifies the Office of Enforcement and Oversight as responsible for conducting independent evaluations of DOE sites, facilities, organizations, and operations in the subject areas of safety and security. The Order further defines safety and security programs as: (1) programs for the protection of the public, the environment, and worker health and safety; and (2) programs for the protection of security assets to include special nuclear materials and sensitive and classified information in all forms. To implement this responsibility, the Office of Enforcement and Oversight's Independent Oversight Program conducts independent appraisals to identify gaps and vulnerabilities in security, cyber security, safety, and emergency management programs and performance in order to prevent and mitigate the effects of events that could negatively impact workers, the public, the environment, or national security. Independent oversight activities are selected and tailored to the unique needs of each DOE program and site office, and consider relative risks and past performance in determining specific assessment activities. HSS nuclear material, classified information, and cyber security independent oversight activities directly support DOE's mission of national security by determining whether special nuclear materials and classified and sensitive information are adequately protected. HSS independent oversight of safety and emergency response capabilities helps ensure that workers and the public are protected from the hazards associated with the Department's operations and that the potential for adverse events is minimized. Such events have historically caused shutdown of operations and research, and thus impacted DOE's ability to perform its mission. One of the major focus areas of the Independent Oversight Program is ensuring that DOE and DOE contractors have established and implemented effective internal systems for self-identifying deficient conditions and taking appropriate corrective actions. Independent oversight appraisals are designed to complement, not replace, line management's responsibility to monitor and oversee contractor safety and security programs and performance, manage contracts, and conduct self-assessments. The information from Independent Oversight Program activities is available for the Secretary, Deputy Secretary, Under Secretaries, Administrator of the National Nuclear Security Administration, Congressional committees, and other stakeholders, such as unions and local public interest groups, to provide confidence that DOE missions are being performed safely and securely.

These appraisal process protocols are part of a continuing effort to enhance the quality, consistency, and contribution of the Independent Oversight Program's activities and products, and to describe the general process and principal activities for evaluating both the effectiveness of DOE safety and security policies, and DOE line management in implementing those policies. These protocols describe the overall philosophy, approach, scope, and methods to be used when conducting independent oversight appraisals, and have been updated to reflect the program changes that have been implemented in accordance with the Department's 2010 Safety and Security Reform Plan. The two subordinate offices within the Office of Enforcement and Oversight that are principally responsible for implementing the Independent Oversight Program have developed and implemented office-specific procedures and techniques for accomplishing their respective responsibilities in the areas of safety and security that complement the overall processes described in this document. These are described in companion documents called Appraisal Process Guides and other documents that are available on the Independent Oversight Program's web sites.

These protocols have evolved through experience and have been developed to be flexible and easily adaptable as they are applied to the various policies, sites, facilities, and activities being evaluated. As part of the continuing effort to improve its program, the Office of Enforcement and Oversight anticipates making periodic updates and revisions to these protocols in response to changes in DOE program direction and guidance, insights gained from appraisal activities, and feedback from customers and constituents. Therefore, users of these protocols, as well as other interested parties, are invited to submit comments and recommendations to the Office of Enforcement and Oversight for consideration.

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## Acronyms

DNFSB	Defense Nuclear Facilities Safety Board
DOE	U.S. Department of Energy
HSS	Office of Health, Safety and Security
ISM	Integrated Safety Management
NNSA	National Nuclear Security Administration
NRC	Nuclear Regulatory Commission
OSHA	Occupational Safety and Health Administration
QRB	Quality Review Board

## Definitions

**Appraisal:** An Independent Oversight activity conducted by the Office of Health, Safety and Security's Office of Enforcement and Oversight to evaluate the effectiveness of line management performance or the adequacy of DOE policies and requirements. [DOE Order 227.1]

**Deficiency:** A deficiency is an inadequacy (e.g., failure to implement a requirement or meet a performance standard) that is found during an appraisal. Deficiencies may serve as the basis for one or more findings. [DOE Order 227.1]

**Directives:** Directives are described in DOE Order 251.1, *Departmental Directives Program*.

**DOE:** U.S. Department of Energy. References to DOE in this protocol, unless specifically indicated otherwise, are assumed to encompass the National Nuclear Security Administration (NNSA).

**Closeout Briefing:** A verbal summary of the appraisal results given to DOE/NNSA management and the responsible DOE/NNSA contractor(s). Closeout briefings are normally conducted by the appraisal team leader before departing the facility or site that was subject to the appraisal.

**Cognizant Manager:** The DOE field or Headquarters manager who is directly responsible for program management and direction, and the development and implementation of corrective actions. Cognizant managers may be line managers or managers of support organizations. [DOE Order 227.1]

**Findings:** Findings are items identified in appraisal reports that warrant a high level of attention on the part of management and aspects of a program that do not meet the intent of DOE policies and requirements. If left uncorrected, findings could adversely affect the DOE mission, the environment, worker safety or health, the public, or national security. Findings define the specific nature of the deficiency, whether it is localized or indicative of a systemic problem, and identify which organization is responsible for corrective actions. Alternative terminology may be used to denote findings identified in appraisal reports to be consistent with program or site-specific terminology for items requiring corrective action. [DOE Order 227.1]

**Imminent Danger:** Conditions or practices in the workplace where a danger exists that could reasonably be expected to cause death or serious physical harm either immediately or before the abatement of such danger, through normal procedures, would otherwise be required. [DOE Order 227.1]

**Line Management:** Line management refers to the unbroken chain of responsibility that extends from the Secretary of Energy to the Deputy Secretary, to the Secretarial Officers who set program policy and plans and develop assigned programs, to the program and Field Element Managers, and to the contractors and subcontractors who are responsible for execution of these programs. It is distinct from DOE support organizations, such as the Office of Health, Safety and Security and the Office of Management, which also have support responsibilities and functions important to security and safety. [DOE Order 227.1]

**Major Vulnerability:** A vulnerability which, if detected and exploited, could reasonably be expected to result in a successful attack causing serious damage to the national security. [DOE Order 227.1]

**National Security Interests:** Activities performed at DOE or DOE contractor, subcontractor, consultant, or other facilities or installations that involve classified matter, special nuclear materials, nuclear

weapons, nuclear weapons components and devices, critical infrastructure, government property of high value or that would impact DOE program continuity, or otherwise are deemed important.

**Opportunities for Improvement:** Opportunities for improvement are suggestions offered by the Independent Oversight appraisal team that may assist line management in identifying options and potential solutions to various issues identified during the conduct of the appraisal. Opportunities for improvement are not mandatory, and they do not require formal resolution by management through a corrective action process.

**Performance Tests:** Activities conducted to evaluate all or selected portions of safety and security systems or programs as they exist at the time of the test.

**Policy:** The term “DOE policy” or “policy” when used in lower case in this document is meant to include all documents describing the philosophies, fundamental values, administration, requirements, and expectations for operation of the Department. It includes but is not limited to DOE Policies issued under DOE Order 251.1C. [DOE Order 227.1]

**Program Secretarial Officers:** Heads of DOE Departmental Elements as listed in the DOE Executive Secretariat Correspondence Style Guide or at <https://powerpedia.energy.gov/wiki/PSO>.

**Ratings:** Ratings are indicators of management system performance levels. The three ratings are: Effective Performance (green), Needs Improvement (yellow), and Significant Weakness (red).

**Safety and security programs:** Includes (1) programs for the protection of the public, the environment, and worker health and safety; and (2) programs for the protection of security assets to include special nuclear materials and sensitive and classified information in all forms. Safety and security programs include cyber security and emergency management programs. [DOE Order 227.1]

**Validation:** The process by which the Independent Oversight Program ensures the factual accuracy of collected data and ensures that identified deficiencies, and their impacts, are effectively communicated to responsible managers and organizations.



## Section 1 – Introduction

### Vision

The Independent Oversight Program’s vision is to stimulate improvements in U.S. Department of Energy (DOE) safety and security programs by providing independent, objective, accurate, timely, and credible information regarding the status and effectiveness of those programs, and by identifying potentially useful and effective program improvements.

### Mission

The Independent Oversight Program’s mission is to provide the Secretary of Energy and senior DOE managers with an independent assessment of the effectiveness of DOE policy and performance in the areas of safety and security, and other critical functions as directed by the Secretary. This effort is designed to support all mission areas of the Department in a manner that promotes innovation and efficiency, while at the same time providing necessary assurances for the health and safety of workers, the public, and environment, and the protection of national security assets. The Independent Oversight Program is the exclusive focal point for independent evaluation of DOE sites, facilities, organizations, and operations in the subject areas of safeguards and security, cyber security, nuclear safety, emergency management, and occupational safety and health. Within that broad scope, the main focus of the program is on the independent oversight of high consequence activities, such as nuclear operations, and the protection of the highest value security assets, such as special nuclear material and classified matter and information. Authority is established by DOE Order 227.1, *Independent Oversight Program*, as well as other DOE directives (e.g., DOE Policy 226.1B, *Department of Energy Oversight Policy*; DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*; DOE Order 151.1C, *Comprehensive Emergency Management System*; and DOE Order 205.1B, *Department of Energy Cyber Security Program*), which identify responsibilities for independent oversight in the areas of safety and security.

### Organization

The Independent Oversight Program is structured to meet mission requirements. The program resides within the DOE Headquarters Office of Health, Safety and Security (HSS) and consists of the Director, Office of Enforcement and Oversight, the Deputy Director for Oversight, and two of the five subordinate offices within the Office of Enforcement and Oversight. The two subordinate offices are the:

- Office of Security and Cyber Evaluations, and
- Office of Safety and Emergency Management Evaluations.

The remaining three subordinate offices within the Office of Enforcement and Oversight are responsible for implementing DOE’s Safety and Security Enforcement Program.

### Independence

The Office of Enforcement and Oversight is charged with the independent oversight of safety and security programs throughout the Department. Independence is assured by a direct reporting relationship to the Office of the Secretary of Energy, outside any line management reporting chain, through the Chief Health, Safety and Security Officer. The Office of Enforcement and Oversight and its subordinate offices

do not have any direct responsibility for facility operations, protection program management, information systems management, or policy formulation.

The Office of Enforcement and Oversight exercises independence in the conduct of all Independent Oversight Program activities. While the selection and scheduling of appraisal activities is independent of line management, the Office of Enforcement and Oversight considers line management's assessment schedules and activities during planning to promote effective and efficient use of the Department's resources. Appraisals are performance-based assessments of how sites and organizations implement the requirements established in Federal and DOE regulations and directives, with an emphasis on the effectiveness of the program elements being evaluated in achieving the intended level of protection or risk reduction. The Independent Oversight Program also provides feedback on the effectiveness of directives and whether they adequately establish effective program requirements. Consequently, the Independent Oversight Program uses the professional judgment of experienced staff to provide an overall evaluation of safety and security program status, including the impact of regulations, orders, and directives governing implementation.

On occasion, Independent Oversight Program staff may conduct limited site assistance activities when requested by line management. While this function is typically performed by the HSS offices with responsibilities for policy or assistance, there are cases where Independent Oversight staff may possess knowledge, skills or abilities that are uniquely suited to helping to address a particular issue. These activities are conducted separately from appraisals and are scoped specifically to meet a defined need. All assistance activities performed by Independent Oversight staff must be approved in advance by the Director of the Office of Enforcement and Oversight, and the Director must review and approve any documents developed by Independent Oversight staff relating to assistance activities that will be distributed outside of HSS. Except as explicitly approved by the Director, any assistance provided by Independent Oversight will be diagnostic and evaluative in nature, and not staff augmentation in support of program development or execution.

## **Roles and Responsibilities**

Responsibilities for conducting the Independent Oversight Program are distributed along topical lines to the two respective subordinate offices that perform independent oversight functions.

### **Office of the Director**

The Director of the Office of Enforcement and Oversight, and Deputy Director for Oversight, provide strategic direction (e.g., setting priorities, establishing policies, approving appraisal plans, administering the office, and developing and maintaining the necessary infrastructure) and quality management (e.g., reviewing and approving reports, ensuring effective validation processes, and establishing Quality Review Boards). This office also provides communication, coordination, and feedback with the Secretary; the Deputy Secretary; the Chief Health, Safety and Security Officer; and other senior DOE managers to identify issues and concerns and to support interface with DOE program offices and field elements, congressional staff, and other stakeholders.

Specifically, the Director:

1. Directs and manages the Department's Independent Oversight Program.

2. Develops and maintains Independent Oversight Program policies, procedures, standards, and guidelines.
3. Provides DOE managers with independent evaluations of safety and security policies, programs, and implementation. Evaluations may be provided in various written formats (e.g., inspection, independent review, targeted or special review, operational awareness, activity, and follow-up review reports).
4. Briefs senior DOE officials, including, when appropriate, the Secretary and Deputy Secretary; Under Secretaries; Secretarial Officers; the Chief Health, Safety and Security Officer; and DOE policy organizations on the results of appraisal activities.
5. Coordinates with the DOE Inspector General when appraisal activities identify concerns that may have criminal or waste/fraud/abuse implications. Determines the appropriate distribution of appraisal reports.
6. Develops and maintains protocols for conducting safety and security appraisals. These protocols address appraisal priorities and scheduling; appraisal planning; data collection, analysis, and validation methods; development of ratings, findings, and opportunities for improvement; report preparation; and follow-up activities, as appropriate.
7. Ensures that subsequent appraisal activities review the effectiveness of corrective actions using a tailored approach based on significance and complexity.
8. Works with cognizant DOE line managers and policy organizations to resolve disagreements on appraisal schedules, results, findings, or ratings.
9. Cooperates with the Defense Nuclear Facilities Safety Board (DNFSB), including providing ready access to appraisal results, and responds to DNFSB inquiries and recommendations, as applicable.

### **Subordinate Oversight Offices**

The following responsibilities are common to the Offices of Security and Cyber Evaluations and Safety and Emergency Management Evaluations in the performance of independent oversight activities associated with their respective subject areas:

- Developing and maintaining detailed plans, guides, procedures, and protocols as necessary to assist in accomplishing office-specific missions and responsibilities
- Coordinating the scheduling, notification, and planning of appraisals with appropriate Headquarters and field element managers
- Conducting independent evaluations of DOE sites, facilities, organizations, and operations in subject-specific programs
- Advising appropriate managers promptly of major vulnerabilities or imminent danger identified during appraisal activities

- Developing, publishing, and disseminating final reports of the results of independent evaluations to effect appropriate line management cognizance of issues, effective sharing of lessons-learned, and stakeholder awareness of oversight activities
- Evaluating DOE policies related to subject-specific programs
- Coordinating with the applicable DOE policy organization to resolve policy findings or deficiencies and to ensure accurate interpretation of requirements
- Performing ongoing analyses to identify trends and emerging issues in subject-specific programs
- Reviewing and commenting on the adequacy of corrective action plans developed in response to appraisal reports when requested by the cognizant DOE manager or directed by the Director of Enforcement and Oversight
- Performing follow-up reviews as appropriate to evaluate progress and effectiveness in implementing corrective actions for previously identified issues
- Performing complex-wide, cross-cutting studies of subject-specific program issues of interest
- Identifying opportunities for improving subject-specific program performance
- Reviewing other governmental and commercial subject-specific programs to provide benchmarks for DOE performance
- Providing resources, as necessary, to participate in special reviews.

#### *Office of Security and Cyber Evaluations*

The Office of Security and Cyber Evaluations is responsible for the independent evaluation of the effectiveness of safeguards and security, including information security, policies and programs throughout the Department. These activities are undertaken to provide assurance that special nuclear material, classified matter, and classified and sensitive information are being protected from theft, sabotage, diversion, loss, or unauthorized disclosure. The office also performs follow-up reviews to ensure that corrective actions are effective and that complex-wide issues and generic weaknesses in safeguards and security and information security are appropriately addressed. The programs that are evaluated generally include the following functional areas:

- Protection program management
- Personnel security
- Cyber security
- Physical security systems
- Nuclear material control and accountability
- Classified matter protection and control
- Protective force
- Classification and information control.

In addition to the generic responsibilities for the two Independent Oversight Program subordinate offices, specific independent oversight responsibilities for the Office of Security and Cyber Evaluations include:

- Performing periodic appraisals of safeguards and security and cyber security programs, including the conduct of performance testing at DOE sites possessing significant amounts of special nuclear material, classified information, or other national security interests
- Maintaining the Composite Adversary Team used to perform force-on-force performance exercises
- Maintaining capabilities for performing remote network testing through penetration testing, and for simulating realistic adversarial attacks on DOE computer networks to identify vulnerabilities
- Conducting annual evaluations of cyber security for DOE national security systems and DOE intelligence systems, and providing input for the annual evaluation of DOE unclassified information security programs and the annual evaluation of U.S. Intelligence Community elements as required by the Federal Information Security Management Act
- Conducting annual “red team” computer security evaluations of the National Nuclear Security Administration (NNSA) national laboratories
- Evaluating the effectiveness of cyber security tools, when needed

#### *Office of Safety and Emergency Management Evaluations*

The Office of Safety and Emergency Management Evaluations evaluates nuclear safety, selected safety programs, integrated safety management (ISM) performance, and emergency response capabilities to determine the status and to provide feedback to line management for needed improvements. These activities are undertaken to ensure adequate protection of the public, workers, and the environment, particularly at DOE sites with nuclear facilities or conducting nuclear or radiological activities. For sites with nuclear facilities or activities, the office has implemented a Site Lead Program whereby a designated staff member is assigned to monitor site activities and maintain operational awareness of nuclear facilities and operations, and use this information to plan and coordinate independent oversight review activities. The office’s appraisal activities are primarily focused on:

- Evaluating the status of nuclear safety at DOE nuclear facilities, including functionality of vital safety systems and other nuclear safety programs and functions
- Conducting reviews of design and construction of new or significantly modified nuclear facilities as identified by the need for a DOE operational readiness review in accordance with DOE Order 425.1C, *Startup and Restart of Nuclear Facilities*
- Conducting targeted, multi-site nuclear safety reviews of selected focus areas that are of interest due to known performance deficiencies, high risks, or recent changes in requirements
- Evaluating emergency response capabilities at DOE sites with nuclear activities and significant quantities of hazardous materials

- Conducting reviews of safety programs at sites or within organizations where performance may present significant risk (e.g., less than expected safety performance and/or serious or recurring incidents or violations of requirements)
- Evaluating line management feedback and improvement processes

### **Interface with Other Organizations**

The Independent Oversight Program places significant emphasis on working with policy organizations, Headquarters program offices, and field organizations to ensure that identified deficiencies are accurately characterized and adequately addressed. This approach has met with considerable success because of the combined effort of DOE field and Headquarters organizations and the support of senior DOE management. The Office of Enforcement and Oversight also works closely with the other HSS offices and routinely interfaces with organizations external to DOE, such as Congress and the DNFSB.

## Section 2 – Independent Oversight Appraisals

### Introduction

The Independent Oversight Program’s appraisal process provides a disciplined and consistent approach to monitoring, evaluating, and reporting the status of the implementation of safety and security programs within DOE. The process has been developed and refined over time and tested through repeated use during many different types of assessments. This document describes the essential elements of that process, all of which are closely tied to established Independent Oversight Program goals and philosophy.

These appraisal process protocols provide an overview of the general process that applies to all independent oversight appraisal activities. The subordinate oversight offices maintain more detailed program plans, guides, procedures, and protocols as necessary to assist in accomplishing their specific missions and responsibilities.

### Program Scope

The Office of Enforcement and Oversight conducts independent oversight activities for the entire Department, including the NNSA, except for the following (unless otherwise stated):

- Naval Nuclear Propulsion Program
- Bonneville Power Administration safety programs.

The focus of most independent oversight appraisal activities is on high hazard activities, such as nuclear operations, and the protection of high-value security assets. However, the Office of Enforcement and Oversight is authorized to conduct independent oversight activities regarding all aspects of Departmental safety and security programs except for the following:

- For aviation safety, independent oversight is performed by the Office of Aviation Management within the Office of Management.
- For nuclear explosives safety, independent oversight is performed by the NNSA.
- For water impoundment structures and dams, independent oversight of structural integrity is performed by the Federal Energy Regulatory Commission via a memorandum of agreement managed by HSS.

The Independent Oversight Program generally conducts reduced oversight of activities that are licensed by the Nuclear Regulatory Commission (NRC) or subject to regulation by the Occupational Safety and Health Administration (OSHA). The scheduling of any independent oversight appraisals pertaining to these activities will first consider the inspection and assessment activities of the NRC or OSHA in order to eliminate or minimize duplication of effort. However, the Independent Oversight Program retains the authority to conduct oversight of these activities when necessary to ensure that DOE safety and security interests are being effectively managed.

## Appraisal Types

All Independent Oversight Program activities are designed to satisfy mission requirements. The oversight function is “independent” from DOE’s line program offices (line management) in that the Office of Enforcement and Oversight and all of its subordinate offices have no responsibility for operations, projects, programmatic activities, or policy development.

The Independent Oversight Program conducts a number of activities, collectively referred to as appraisals, related to evaluating DOE policy and DOE and contractor line management performance in the areas under its purview. Appraisals can generally be grouped into six types of activities: (1) inspections, (2) independent reviews, (3) follow-up reviews, (4) targeted reviews, (5) special reviews, and (6) operational awareness activities.

Regardless of the type of appraisal activity conducted, a validated report is published. The majority of reports, other than those for operational awareness activities, will provide recommendations or opportunities for improvement for line management to consider as possible program enhancements. Depending upon the results of the appraisal, reports may identify findings, which require corrective action by line management. Appraisal reports may use other terminology to denote findings, such as weaknesses or issues, that is consistent with site or organization-specific terminology used to identify items requiring corrective action. Some reports may include ratings. The Independent Oversight Program rating system is described in section 5 of this document.

## Inspections

Inspections are typically broad in their program coverage and technical span, or are a comprehensive and in-depth evaluation of a particular functional area or program. Inspections usually include performance testing to the greatest extent possible. Periodic inspections are scheduled activities that determine the adequacy of program performance at a specific site or location, and are most commonly used in conducting independent oversight of security-related programs. Special inspections are usually more limited in scope than periodic inspections, often focusing on a limited number of program elements. They may include major performance tests, evaluation of site emergency response exercises, unannounced inspections, remote scanning or penetration tests of cyber security capabilities, or other inspection activities that may be required on a one-of-a-kind basis.

## Independent Reviews

Independent reviews are generally smaller in scope than inspections and are most commonly conducted based on an analysis of current events or conditions at a particular site or location rather than on a periodic basis. Independent reviews typically focus on a particular facility, operation, organization, program, or project at a site or location. Independent reviews may include performance testing but such testing is also usually of limited scope when compared to performance testing conducted as part of inspections. Independent reviews are a common appraisal activity of the nuclear safety Site Lead Program that has been implemented by the Office of Safety and Emergency Management Evaluations. Independent reviews may encompass independent oversight activities that are conducted in conjunction with a DOE line management assessment activity or an assessment sponsored by another HSS office (e.g., the Office of Classification) or a DOE Headquarters staff office (e.g., the Office of the Chief Information Officer).



### Follow-up Reviews

Follow-up reviews are conducted to determine the status and progress of corrective actions and other actions taken in response to deficiencies previously identified by independent oversight appraisals or DOE line management oversight activities. Follow-up reviews are aimed at evaluating the effectiveness and sustainability of corrective actions.

### Targeted Reviews

Targeted reviews are conducted to address concerns that transcend performance at a specific site or location. They might address the effectiveness of program elements as implemented across DOE by analyzing complex-wide program issues, or they might analyze the implementation of a specific policy item throughout the complex. Targeted reviews are also performed to address an area, concern, deficiency, or weakness within a program, and might focus on the status of a specific program element, the adequacy of specific policies, or the implementation status of specific policies throughout DOE.

### Special Reviews

Special reviews are conducted at the request of the Secretary or other senior DOE managers, often on a “rapid response” basis, to provide specific needed information about DOE safety and security programs and policies, or other critical DOE functions. Special reviews directed or requested by the Secretary or other senior DOE officials may address areas outside safeguards and security, cyber security, nuclear safety, emergency management, or integrated safety management programs. Alternatively, the Chief Health, Safety and Security Officer may propose that an Independent Oversight Program special review be conducted if a need to do so is perceived.

### Operational Awareness Activities

Operational awareness activities are conducted to obtain current information about operations, activities, and initiatives at a site or within a program, and may involve touring facilities and attending meetings. These activities serve a vital role in ensuring that Independent Oversight Program managers have up-to-date and accurate information upon which to base decisions about appraisal priorities, schedules, and scopes.

### Appraisal Goals

The goals of the Independent Oversight Program’s appraisals are to:

- Determine whether the implementation of safeguards and security, cyber security, nuclear safety, integrated safety management (ISM), and emergency management programs meet the requirements established by DOE policy and whether those programs are effective.
- Determine whether DOE policies and policy guidance in the areas of safety and security are effective.
- Assess the impact of identified deficiencies, taking into account mitigating factors, compensatory measures, and current or planned corrective actions.
- Determine the status of actions relative to previously identified deficiencies.

- Present potential enhancements for consideration for strengthening implementation of safety and security programs or addressing identified deficiencies.

## Appraisal Philosophy

To accomplish its mission and achieve its goals, the Independent Oversight Program employs a set of carefully developed and experience-based principles.

- 1. Planning is the foundation of all appraisals.** Detailed and coordinated planning must precede all appraisals and must continue through the conclusion of each appraisal.
- 2. Coordination with DOE Headquarters elements and the field is essential.** The ultimate objective of the Independent Oversight Program is to improve DOE's performance, which can best be achieved through coordination and openness at all levels.
- 3. Appraisals must be based on established standards.** National standards established by Congress, DOE, and other executive agencies are the basic requirements with which DOE programs must comply. DOE policy is promulgated through DOE directives and regulations. Other national standards are exemplified by applicable public laws, regulations, executive orders, and other directives. Program-specific standards are requirements established by Program Secretarial Officers for sites and programs under their cognizance. Local standards are those imposed by local DOE site offices, the facility contractor, or subordinate contractors responsible for administering programs within their areas of operation. Program-specific and local standards usually pertain to site-specific implementation of national requirements, and may impose more stringent requirements. These types of standards are promulgated through DOE program and site office implementing instructions, contractor procedures, site safeguards and security plans, cyber security program plans, ISM plans and procedures, and emergency plans. Independent Oversight Program reviews use appropriate program-specific and local standards to evaluate programs, especially if they differ from or cover areas not addressed by national requirements.
- 4. Appraisals must be fair, reasonable, and factual.** The Independent Oversight Program strives to be fair, reasonable, and factual in conducting appraisals and interpreting how DOE policies and standards are applied to specific programs. All data used in the evaluation process are validated at multiple levels to ensure correctness.
- 5. Performance is the most accurate indicator of a program's effectiveness.** Whenever possible, the Independent Oversight Program utilizes existing performance indicators and conducts performance tests to assess the adequacy of a program or program element. Through the review of performance data and performance test results, the Independent Oversight Program determines the effectiveness of a safety or security program in implementing the intent and objectives of DOE policy.
- 6. The review of policies must be performed from a holistic and practical perspective.** In determining the adequacy of DOE policies, the Independent Oversight Program considers such things as whether the policy sufficiently defines expectations, the expectations are clearly articulated, and the requirements are able to be implemented in real-world conditions. Independent Oversight Program personnel maintain a strong dialogue with applicable policy organizations to ensure an in-depth understanding of the intent of policy as part of evaluating its effectiveness.

7. **Appraisals must provide meaningful, accurate, and current information.** The reports developed as a result of appraisals must clearly present the results of the appraisal, identifying and analyzing the impacts of strengths and weaknesses. Additionally, when possible and appropriate, potential opportunities for improvement are identified for consideration.
8. **The cooperation of field elements are essential in conducting thorough, efficient, and fair appraisals.** Local representatives provide detailed site and system knowledge for planning; arrange administrative and logistical support; expedite data collection activities; and identify the local points of contact who participate during scoping, planning, data collection, validation, and closeout activities. Relationships between Independent Oversight Program and local representatives should be cordial, open, and professional in order to facilitate the efficient execution of appraisal activities.
9. **The qualifications and objectivity of Independent Oversight Program appraisers are of paramount importance.** It is essential that appraisal team members be knowledgeable of applicable standards, technically competent in their assigned areas, cognizant of the Independent Oversight Program's philosophies and goals, free from any conflicts of interest with organizations subject to appraisal, and able to successfully perform all necessary functions related to their appraisal responsibilities. Independent Oversight Program federal staff training and qualification programs are intended to maintain and continually improve mission performance.

## Appraisal Phases

All appraisals can be characterized by four major activities or phases.

1. **Planning (including scoping).** The planning phase includes those activities necessary to prepare for all aspects of an appraisal, both on and off site. These activities include coordination within the Independent Oversight Program and with DOE and contractor entities, as applicable; research of facilities and topical areas to be reviewed; development and issuance of review plans (see example in Appendix C); document requests from the site and other DOE organizations; logistical arrangements; information technology resource determinations; security and training considerations; and similar considerations. When necessary, onsite scoping or operational awareness activities may be conducted to identify which operations or facilities will be the subject of the review.
2. **Conduct (including informal validation).** The conduct phase includes that portion of the appraisal principally devoted to collecting and validating data obtained through interviews, review of documents and operating data, observations of operations, and performance testing, such as tabletop and force-on-force exercises. Although the majority of data collection activity is performed on site, some activities may be accomplished via document reviews or performance tests at remote locations. Collected data is validated on a continuous basis via cross-referencing sources, meetings with site counterparts, and other means. For smaller appraisals, an exit meeting is typically convened at the end of the onsite data collection activities to convey preliminary observations and describe the process for subsequent factual accuracy review of the draft appraisal report.
3. **Reporting (including formal validation).** While informal validation occurs as data is being collected, the report preparation and formal validation phase involves data integration and analysis, deficiency and finding identification, rating determination (if applicable), draft report

preparation, and quality review. For inspections, most of this phase is conducted at the site or facility being reviewed and a draft report is left with site management for final factual accuracy review following an exit meeting. For smaller appraisals, report writing occurs at Headquarters and a draft report is transmitted informally to site management for review and validation.

- 4. Closeout.** The closeout phase includes disposition and resolution of comments and final report issuance. For some appraisals, this phase may also include Headquarters briefings, external briefings (e.g., Congressional committees), and reviews of proposed corrective actions.

Although these phases are identified by the primary activities they encompass, actual component activities may overlap significantly. For example, data may be collected during the planning phase, and planning (particularly for performance testing) can extend into the data collection phase. Similarly, analysis begins during data collection and continues throughout the process. Subsequent sections of this document describe the activities and expectations associated with these major appraisal phases.

### **Security and Safety Standards of Conduct**

Appraisal team personnel often handle classified and controlled unclassified documents and information while conducting appraisals. This information and documentation may be provided by the facility or organization being visited, or may be generated or provided by appraisal team members. Additionally, team members may use classified word processing, scanning, copying, and destruction equipment in performing such duties as recording data and writing reports. Team members are frequently required to access security-sensitive work areas where certain electronic equipment and other prohibited items must not be introduced.

While working at DOE Headquarters facilities and field sites, team members are expected to comply with security-related postings and placards that indicate the boundaries of limited security areas as well as prohibited articles. Team members are required to comply fully with all applicable DOE and local security policies and requirements, such as restrictions on the introduction and use, in sensitive security or limited areas, of prohibited and controlled articles such as personal digital assistants, thumb drives, cell phones, and pagers. Additionally, team members also are expected to comply with all information security and cyber security policies on the use of classified and unclassified computers and the control and handling of documents containing classified or controlled unclassified information.

Team members may also encounter industrial hazards and/or require access to radiological or other posted areas in the performance of their appraisal activities. In addition to fulfilling any training or badging requirements needed to gain general access to a particular site, team members must comply with all site-specific training, personal protective equipment, and escort requirements for access to facilities or areas they will visit. Whenever possible, arrangements should be made with site points of contact to obtain required training in advance of the appraisal. Team members should also ascertain before an appraisal whether they will need to supply their own protective equipment (e.g., safety shoes).

### **Professional Conduct and Relations with Site and Headquarters Personnel**

As stated in the appraisal philosophy section above, the cooperation and assistance of representatives of inspected organizations, whether at Headquarters or in the field, are crucial in conducting a successful appraisal. Independent Oversight Program appraisals evaluate line management at the DOE Headquarters, DOE field element, and facility contractor levels. Appraisal team personnel are required to maintain the highest standards of conduct when dealing with representatives of line management,

including supervisors, managers, workers, and other personnel encountered during appraisal activities. Professional conduct and other guidelines regarding relationships with personnel subject to oversight appraisals are explained in more detail in Appendix A.

Interested DOE Headquarters organizations (such as the Office of the Chief Information Officer, the NNSA Office of Emergency Operations, and program offices)—which may or may not be in the line management chain—sometimes send representatives to observe Independent Oversight Program appraisal activities. Because appraisals are conducted openly, appropriate participation by such organizations is welcomed. Such representatives are encouraged to participate as observers—on a non-interfering basis—in such activities as tours, meetings, and other appropriate data collection activities; however, they are not members of the appraisal team. Appraisal team daily meetings are usually conducted only among appraisal team members.

### **Field Augmentation Program**

The Independent Oversight Program has implemented a field augmentation program that utilizes subject matter experts from DOE field elements and site contractors as members of independent oversight appraisal teams and has made this program a normal part of the Independent Oversight Program's process. The positive aspects of this program to the Department and Independent Oversight Program are that it:

- Provides augmentees (and through them, their managers and sites/organizations) with insight into the Independent Oversight Program's performance-based evaluation approach that can be taken back to their sites and used to improve local survey and self-assessment programs
- Enhances working relationships between Independent Oversight Program staff and site personnel
- Facilitates increased inter-site exchange of approaches, practices, and procedures when augmentees view inspected site operations and/or discuss home site operations with inspectees
- Allows the Independent Oversight Program to take advantage of the considerable subject matter expertise and experience that resides in the field
- Broadens the Independent Oversight Program's perspective (i.e., adds field perspective) in identifying and analyzing potential issues.

The following general program concepts are followed to ensure the integrity of the augmentation program:

- Augmentees must be volunteers who are recommended by field element and contractor managers and who are selected and approved for participation by the Office of Enforcement and Oversight.
- Augmentees are restricted from participation in inspections of their own sites or organizations; contractor augmentees are further restricted from participating in inspections of other sites operated by their employers.
- Augmentees are fully integrated into inspection teams and fully participate as members of the topic team to which they are assigned.

## Section 3 – Appraisal Process Planning

### Introduction

Independent Oversight Program planning is a continuous process, involving a myriad of activities and essentially all staff members. Thorough planning at the strategic, program, and individual appraisal level is the foundation of the Independent Oversight Program.

This section outlines the Independent Oversight Program's general planning processes and responsibilities for developing appraisal schedules and conducting individual appraisal activities. Additional details regarding program-specific planning processes are contained within the subordinate offices' program documentation. Independent Oversight's general approach to site prioritization and appraisal scheduling is outlined in Appendix B

### Goals

It is the goal of the Independent Oversight Program to ensure that its appraisal activities focus on Departmental facilities and programs that have high-value assets, conduct high-risk operations, and/or pose conditions that have the potential to cause the Department and/or the United States irreparable harm, while also maintaining assurance of the overall effectiveness of security and safety programs across the entire Department. The goal when planning appraisal activities is to anticipate every action necessary to meet mission requirements and conduct the highest quality appraisals possible with the available resources.

### Strategic and Program Planning

Strategic planning is the responsibility of the Director, Office of Enforcement and Oversight, and the Deputy Director for Oversight, with input from the directors of the two subordinate oversight offices. Strategic planning involves taking a long view of evolving threats and conditions, and adjusting the organization's resources, processes, capabilities, and schedules to meet the strategic needs of the office and the Department. For example, the increasing number of cyber security attacks against DOE computer networks and the desire of terrorist groups to obtain special nuclear, radiological, chemical, and biological materials for use in attacks against U.S. targets has required the Independent Oversight Program to enhance its capabilities and employ new assessment techniques in recent years.

The Independent Oversight Program recognizes that its program is just one of many elements of the Department's overall approach to providing assurance of the effectiveness of its safety and security programs. Other major elements include the line management contract performance mechanisms mandated by Federal and Departmental acquisition regulations, field element and program office assessment programs, field element oversight of contractor assurance systems and self-assessment programs, and the safety and security regulatory enforcement program that is also implemented by the Office of Enforcement and Oversight. Thus, the Independent Oversight Program works closely with Headquarters and field elements when scheduling and planning appraisal activities to maximize efficient and effective use of resources and minimize unnecessary duplication of effort, while also ensuring that appropriate Federal oversight depth and coverage is devoted to those assets and operations that demand it based on risk and complexity. While the Independent Oversight Program endeavors to accommodate DOE line management input on appraisal priorities and schedules, the Office of Enforcement and

Oversight must assure that sufficient information is collected, analyzed, and validated through its own activities in order to effectively fulfill its independent function as mandated by the Secretary.

## **Appraisal Planning**

Thorough planning is the foundation of all appraisals. Appraisal planning requires the gathering and analysis of large amounts of information from many sources, decision-making based on that analysis, and appraisal preparation based on those decisions. The quality of planning significantly affects all other appraisal phases. Because limited amounts of time and other resources are available for planning, these efforts must be focused and efficient.

While the directors of the subordinate oversight offices establish detailed planning requirements and procedures to meet their specific needs, those fall within the scope of the general process outlined here. The overall planning process described within these protocols is applicable to all appraisals regardless of the nature of the appraisal—inspection, review, operational awareness activity, or other—or the size of the team involved. Planning requirements may vary in magnitude for different activities, but the essential elements of planning do not.

## **Management Planning**

Management planning responsibilities are continuous throughout an appraisal's cycle. Most of the early planning requirements are management responsibilities rather than team planning responsibilities. Once an appraisal has been approved and tentatively scheduled, the director of the responsible office or the designated team leader (depending upon the anticipated scope of the appraisal) initiates planning activities, which may include:

- Contacting the affected sites and organizations to begin ongoing coordination
- Determining the tentative scope and focus of the appraisal
- Developing and coordinating a site visit schedule with the site(s)/organization(s) to be visited
- Identifying documents and other information that will be needed for more detailed planning through a data call to the organization(s) being assessed
- Conducting an initial review of available information to assist initial decisions regarding activity scope and focus
- Identifying and acquiring the personnel resources to accomplish both the technical and administrative support aspects of the appraisal, including determining whether participants in the field augmentation program (see Section 2) will be included on the appraisal team
- Identifying and satisfying logistics needs, such as onsite workspace, hotel accommodations, computer and other equipment support, and access authorizations and training
- Directing and overseeing team planning activities at team planning meeting(s) or site planning visit(s)
- Overseeing necessary ongoing planning throughout the course of the appraisal.

The results of management planning activities, with appropriate input from appraisal team planning activities, are used to create a formal plan, which defines the scope and approach for the conduct of the appraisal. Because planning is continuous throughout an appraisal, the formal plan is a “living document,” subject to modification as the activity progresses. A sample Independent Oversight inspection/review plan is shown in Appendix C.

### **Team Planning**

Detailed planning for data collection activities—the essence of all Independent Oversight Program appraisals—typically begins once the team has been established and continues through initial visits to and communications with the site or organization being assessed. For some appraisal activities, Headquarters planning meetings may be convened if necessary based on the judgment of the team leader. During the course of planning, the team will normally be expected to:

- Become familiar with the results of previous appraisal activities.
- Review the objectives and proposed parameters of the appraisal, and any management guidance and expectations.
- Review and analyze available documentation.
- Walk through key facilities at the site.
- Conduct preliminary interviews with DOE and contractor field element, program, and facility managers.
- Meet with stakeholders, as appropriate.
- Contact and conduct appropriate information exchanges with representatives from Headquarters and field personnel.
- Recommend any modifications to activity scope and focus resulting from planning activities.
- Determine appropriate data collection methods and develop detailed data collection plans, including any necessary performance test plans, safety plans, etc.
- Develop a schedule of data collection and related activities.
- Identify additional information and support requirements, and communicate them to the appropriate individuals or organizations.
- Brief or otherwise inform managers of planned activities.

Much of the detailed planning for an appraisal is accomplished before the appraisal team arrives on site, but it should be recognized that planning is an ongoing effort and may continue well into the conduct phase of the activity. Both managers and team members are expected to remain flexible and ready to modify plans in response to unexpected circumstances that may arise during any phase of an appraisal.



## Section 4 – Conducting Appraisals

### Introduction

The conduct phase of an appraisal normally encompasses that period when most of the needed data is collected. This may consist of a concentrated effort during a relatively short period of time, as during an inspection, or it may occur over an extended period, as in some targeted or special reviews. For some types of appraisals (e.g., inspections, operational awareness activities), the conduct phase takes place almost exclusively on site at the inspected facility; for other types of activities, such as cyber security scans and penetration tests, team members may be located remotely from the subject site. The conduct phase is tailored to the unique needs and objectives of each specific appraisal. This stage is crucial to the success of an appraisal because during this stage, team members collect most of the information that will form the basis of their analyses and conclusions (and ratings and recommendations, when appropriate).

This section addresses the goal and scope of appraisal conduct, data collection methods, data validation procedures, and important related topics.

### Goal

The goal when conducting an appraisal is to accomplish all planned data collection activities in a fair, impartial, professional manner and to validate the technical accuracy of the data collected.

### Data Collection

Since data is critical to a successful appraisal, it is essential that sufficient amounts of accurate, pertinent data be collected. To achieve this, it is important to employ the appropriate data collection methods. Five basic methods of data collection are available to team members: document reviews, interviews, observations, knowledge tests, and performance tests. Since each of these methods has inherent advantages and limitations, the specific methods employed must be carefully selected and used in combination with others to ensure that all necessary data is collected and cross-checked.

Data collection activities generally follow the plans and schedules developed during the formal planning process. Team members usually focus on accomplishing planned activities; however, data collection activities can be adjusted to accommodate changing conditions. For example, early data collection results may necessitate reduced or expanded activities in planned areas of emphasis and investigation of areas not originally identified for review. Issues or potential issues that become apparent during the course of data collection are not ignored simply because they were not included in formal planning.

### Document Reviews

Document reviews are a basic method used in virtually every appraisal. Every DOE program or activity that is reviewed normally has associated with it policy guidance, procedures, records, and other information in documentary form. Even in preparation for employing other data collection methods, such as performance tests, document reviews are usually essential. Document reviews are not limited to paper documents; information in computer databases, computer system directories, and automated logs of computer activity are included in this category.

## Interviews

Interviews can provide useful data that is not readily available from other data collection methods. Interviews are most effective in determining perceptions and individual understanding of policies, procedures, duties, and management expectations. While both formal and informal interview techniques may be employed, deliberate preparation is necessary before any interview. Interview techniques are discussed in Appendix D.

An Independent Oversight Program Federal staff member should normally be present whenever a Federal manager is being interviewed; an Independent Oversight team leader or office director should be present when a senior Federal or contractor manager is interviewed.

## Observations

Observations allow team members to see how personnel actually do their jobs and to evaluate their performance under normal conditions. Such observations provide valuable data about whether personnel follow established procedures, operate equipment properly, etc. However, under some conditions the observer's very presence may skew the performance being observed; consequently, observations are made judiciously and are best used to complement or augment data obtained from other sources. Observations can also be useful in determining how systems and equipment are designed, installed, operated, and maintained.

## Knowledge Tests

Job knowledge may be best assessed through various techniques including interviews, observations, and performance tests. However, formal knowledge tests—particularly written tests—are an efficient and time-saving way to determine whether a large number of people possess a specific body of knowledge. Knowledge tests may be written or oral, or a combination of the two, and appropriate sampling techniques are used in selecting personnel to take the tests. Knowledge tests are developed in conjunction with site trusted agent subject matter experts to ensure that they are fair and factually accurate, and access to test materials is strictly limited and controlled to preclude advanced participant knowledge of the contents. Team members understand that knowledge tests indicate only whether personnel are knowledgeable in certain areas, not whether they can apply that knowledge or perform related duties.

## Performance Tests

Performance testing is one of the most valuable data collection methods available, and is preferred over knowledge testing. In contrast with knowledge testing, performance testing is designed to determine whether personnel have the skills and abilities to perform their duties, whether procedures work, and whether systems and equipment are functional and appropriate. Virtually any skill, duty, procedure, system, or item of equipment can be performance tested. Performance tests may vary in complexity from simple limited-scope testing (e.g., tabletop or specific skill testing) to more complicated facility- or site-level exercises.

Some tests can be conducted under completely normal conditions, where the subject is unaware of the testing (e.g., cyber security penetration testing). Other tests must be conducted under artificial conditions, although maximum realism is always a primary consideration (e.g., force-on-force exercises and no-notice limited-scope security performance tests). While most performance tests must, by their very

nature, be conducted on site, some tests, such as cyber security scans and penetration tests, may be conducted from remote locations.

Before any performance test is conducted during an appraisal, all test activities are appropriately coordinated with site trusted agent representatives or other responsible individuals or organizations. To promote safety and realism in performance testing, Independent Oversight Program representatives are required to establish formal protocols for planning and conducting certain performance tests. These are detailed in the organizational process guides or other protocol documents.

Independent Oversight personnel are not limited to the five basic data collection methods specified above. Different or hybrid methods may be used, and personnel are encouraged to employ the best techniques available for a specific task. For example, a survey or questionnaire, appropriate for some types of appraisals, may share characteristics with the document review, interview, and knowledge test methods.

## **Validation**

Validation is the process the Independent Oversight Program uses to verify the accuracy of the information obtained during data collection activities. It is a critical element in the conduct of all appraisals. While validation occurs throughout the conduct phase of the appraisal, a more formal validation of the appraisal results occurs when the draft appraisal report is provided for review as described in section 5. Validation is a continuous process to ensure that:

- All collected data is factually correct and can legitimately be used to evaluate the effectiveness of the program, project, or activity.
- Points of contact and site management are aware of the data that has been collected. They must acknowledge its accuracy, provide correct information, request that further data be collected, or provide mitigating information. Representatives of the Headquarters program office, DOE field element, contractor organizations, and any affected policy office should participate in validation as appropriate to provide feedback on the factual accuracy of information related to their organization.

Procedures employed during all independent oversight appraisals include a process for ongoing validation activities. Information is validated with the point of contact as it is collected or as soon thereafter as practical; during daily validation meetings with points of contact; at daily management briefings; periodically throughout the conduct phase; and during summary validation meetings at the end of data collection; as well as during reviews of draft reports.

## **Communication/Integration**

Communication among team members, between the team and the site or organization being evaluated, and between the team and Headquarters is an essential element of all appraisal activities to ensure integration of collected data and to keep site management and relevant Headquarters organizations informed of progress and identified deficiencies. Methods to be used may include face-to-face discussions, daily team meetings, daily site management debriefs, daily reports, and mid-point “rollups.”

As data is collected by various team members during all appraisals, it is important that all appropriate information is shared among team members in a timely manner. Information collected by one team member may have a direct impact on a line of inquiry being conducted by another. When teams are

large—and particularly when several sub-teams are involved and each is focusing on a different area or discipline—a conscious and deliberate effort at information integration is required. Specific methods for achieving integration vary from formal to informal, will be influenced by the team size and type of activity involved, and may include team meetings, shared data collection notes, and daily reports to managers. Specific methods to be employed are left to the discretion of the responsible appraisal team leader.

Equally important is communication between the appraisal team leader and site management regarding the progress of appraisal activities and potential issues identified by team members. This is typically achieved through informal daily management debriefs, although the nature of the appraisal and the presence of external stakeholders may require more formal methods to be used. Daily debriefs provide the opportunity for the appraisal team leader to present observations identified by the team to site management and give site managers an opportunity to provide additional information.

An “Issue Form” may be used to facilitate communication between the appraisal team and site management to document significant issues (such as an imminent danger or a major vulnerability) or to convey an emerging issue that may be more clearly or more effectively communicated in writing before the team’s report is developed and validated. A sample of the Issue Form and procedures for its use are provided in Appendix E.

The appraisal team leader is also responsible for keeping senior Office of Enforcement and Oversight and HSS management informed of appraisal activities. For inspections, verbal and/or written reports are typically provided on a daily basis. Communication with Headquarters organizations (e.g., program office, policy office) is also conducted as appropriate to validate or clarify team observations, especially if potential deficiencies in program implementation are identified.

At the conclusion of any onsite data collection activities, the appraisal team leader typically conducts an exit meeting with site management. In some cases, the draft appraisal report will be provided to site management at the conclusion of the exit meeting for formal validation. In other cases, the team will draft the report following their return to Headquarters. In either case, the exit meeting will convey the team’s preliminary observations and, in some cases, preliminary conclusions, and expectations for completing the appraisal process.

### **Response to Major Vulnerabilities or Imminent Danger**

The Office of Enforcement and Oversight is required to notify the cognizant DOE manager verbally as soon as possible and in writing within 24 hours when appraisal activities indicate one of the following conditions:

1. Conditions or practices in the workplace where a danger exists that could reasonably be expected to cause death or serious physical harm either immediately (imminent danger) or before the abatement of such danger could otherwise be accomplished through normal work control processes.
2. A major safeguards and security or cyber security vulnerability (e.g., unacceptable risk of special nuclear material theft or diversion, radiological or industrial sabotage, espionage, or significant compromise of classified information).

This notification is typically initiated by the appraisal team leader and is communicated as soon as possible directly to the DOE site manager. The Issue Form in Appendix E can be used to provide the written notification.

## **Section 5 – Appraisal Reporting and Formal Validation**

### **Introduction**

The report preparation and formal validation phase of an appraisal generally takes place after data collection is complete (although, at times, these activities may identify additional data needs). Data must be organized, assimilated, and analyzed in order to form conclusions and report the results. This section discusses the various tasks to be accomplished during the report preparation and formal validation phase, including data analysis, determination of findings, assignment of ratings (if appropriate), identification of opportunities for improvement and policy weaknesses, and report preparation.

### **Goals**

The main goals of this phase are to thoroughly analyze all available data, draw valid conclusions from that analysis, and, based on the analysis and conclusions, prepare a report that accurately reflects the status of the program(s), program element, facility, or activity being examined and provides managers the information they need to develop and effect necessary corrections.

### **Integration**

The information integration discussed in the previous section continues to be important during the report preparation phase. During data analysis, all pertinent information, regardless of who collected it, is considered in the effort to reach valid conclusions. Not only is raw data shared, but conclusions and other results of analysis are also shared, as appropriate, among team members.

### **Analysis of Results**

While analysis is an ongoing process during all phases of an appraisal, it culminates during the report preparation phase. Analysis involves a critical review of all data collection results, particularly any identified program deficiencies, strengths, and weaknesses, and leads to logical, supportable conclusions regarding how well the program functions or the program element has been implemented, and satisfies the intent of DOE policy.

If no deficiencies are identified, analysis is a relatively simple matter. However, if deficiencies in performance are identified, the analysis must consider these observations individually and collectively, and then must balance them against identified strengths or mitigating factors to determine the overall impact on the program's effectiveness. Factors considered during analysis include:

- Whether the observed deficiency is isolated or systemic
- Whether program managers and other line managers knew of the deficiency, and if so, what actions were or are being taken
- The importance or significance of the deficiency in comparison to the applicable standard
- Mitigating factors, such as the effectiveness of other programs or program elements that may compensate for the deficiency

- The deficiency's actual or potential effect on mission performance or accomplishment
- The magnitude and significance of the actual or potential vulnerability to DOE interests resulting from the deficiency.

The analysis must result in—and support—conclusions regarding how successfully the program or program element meets requirements.

## Findings

One product of appraisal analysis may be the identification of findings. Findings are used to indicate significant deficiencies or safety or security issues that warrant focused attention on the part of management. Team members are responsible for determining which appraisal results are designated as findings. Findings are focused on improving performance and are linked to applicable requirements. Any program element or system that is not in compliance with DOE policy or that does not meet DOE performance standards may be identified as a finding; however, teams are expected to exercise judgment in determining findings. Minor and non-systemic deficiencies, while they must be appropriately identified so that they can be corrected, are normally not designated as findings.

Findings are presented in a manner that identifies both the specific problem and the appropriate DOE (or other) reference. If multiple findings each address specific aspects of a single standard, the potential findings may be "rolled up" and reported as a single finding *if* the single finding statement can clearly and completely convey the problems observed. Findings are always worded to express the specific nature of the deficiency, clearly indicate whether the deficiency is localized or indicative of a systemic problem, and clearly identify which organization (DOE Headquarters or field element, facility contractor, etc.) is responsible for corrective actions. Typically, assignment of a finding includes a discussion of the impact of the condition described, including any mitigating factors and compensatory measures.

## Ratings

For inspection activities, the conclusions reached through analysis of results may lead to the assignment of ratings. The appraisal team is responsible for recommending ratings; however, final approval for ratings rests with the Chief Health, Safety and Security Officer, with input from the Director, Office of Enforcement and Oversight. Although findings often identify conditions that adversely impact a program's rating, findings do not necessarily impact the rating.

- **Effective Performance (Green):** Assigned when the system being inspected provides reasonable assurance that the identified protection or program needs are met (overall performance is effective). The element being inspected is normally rated Effective Performance if all applicable standards are met and are effectively implemented. An element is also normally rated Effective Performance if, for all standards that are not met, other systems or compensatory measures exist that provide equivalent protection, or if the impact of failure to fully meet an applicable standard is minimal and does not significantly degrade the protection provided. Line managers are expected to effectively address any specific deficiencies identified.
- **Needs Improvement (Yellow):** Assigned when the system being inspected only partially meets identified protection or program needs or is not sufficiently mature and robust to provide assurance that the protection or program needs are fully met. The element being inspected is

normally rated Needs Improvement if one or more of the applicable standards are not met and are only partially compensated for by other systems, and the resulting deficiencies degrade the effectiveness of the inspected system. Line managers are expected to provide sufficient attention to ensure that identified areas of weakness are effectively addressed through corrective actions and/or ongoing initiatives.

- **Significant Weakness (Red):** Assigned when the system being inspected does not provide adequate assurance that the identified program needs are met. The element being inspected is normally rated Significant Weakness if one or more of the applicable standards are not met, there are no compensating factors to adequately reduce the impact on system effectiveness, and the resulting deficiencies seriously degrade the effectiveness of the inspected system. Line managers are expected to apply immediate attention, focus, and resources to the deficient program areas.

### **Opportunities for Improvement**

Independent Oversight Program appraisal team members have a broad range of knowledge in their individual topical areas of expertise, and also have the advantage of observing methods of program implementation across the entire DOE complex. When deficiencies, issues, or inefficiencies in program implementation are identified during an appraisal, it is useful for team members to provide insight on approaches that could be adopted by line management to improve program performance. Often these are based on successful approaches observed at other DOE sites. Specific opportunities for improvement are identified for inclusion in appraisal reports; however, they are provided only in the context of recommendations for line management consideration, not as directed action. Opportunities for improvement that correlate to findings are normally provided to offer suggested approaches that line management may consider in their corrective action plans. Additionally, opportunities for improvement are routinely provided for conditions or performance deficiencies that do not rise to the level of a finding.

In some cases, appraisal reports may include recommendations. Recommendations are typically broader in scope than opportunities for improvement and aimed at improving management systems rather than particular deficiencies. Reports that include recommendations may also include opportunities for improvement that provide suggested steps or actions for addressing issues that are embodied by a recommendation.

### **Policy Weaknesses**

Occasionally during appraisals, deficiencies or issues are observed that stem from policy weaknesses (e.g., lack of policy, lack of clarity in policy, ambiguous or contradictory policies, inappropriate policy, or inappropriate implementation guidance). When such policy weaknesses are identified, they are communicated to the Headquarters element responsible for the policy in question, either via the appraisal report or in a separate written policy issue paper or form (see Appendix E) that identifies the subject, provides necessary background information, states the problem, discusses its implications, and, if appropriate, recommends a course of action. If appropriate for the circumstances, a finding may be written against the policy organization to ensure that corrective actions can be tracked to completion.

### **Report Preparation**

A report is issued as the formal product of any appraisal. Reports are the only published records of specific appraisals, and are intended for dissemination to the appropriate managers at DOE Headquarters and field elements (including, when appropriate, facility contractors). Appraisal reports vary in format



depending upon the scope and nature of the appraisal activity, and the most appropriate format for the specific purpose is used. For longer reports or reports that cover multiple topical areas or organizations, the report may include an executive summary targeted at senior management. Appendix F provides guidance for preparing an executive summary.

### **Draft Report**

During the later stages of an appraisal, a draft report is developed that includes all the necessary elements of the final report. The draft report is reviewed by a Quality Review Board (QRB) to ensure that it is readable and logical, and that it contains adequate information to support the conclusions (and, if appropriate, findings and ratings). The QRB normally consists of HSS managers and senior personnel (usually former senior DOE managers) who support HSS. The QRB is responsible for providing a “reality check” by knowledgeable individuals who have not been close to the data collection effort, and who can therefore evaluate the report’s contents and presentation through fresh eyes, and on its own merits. The QRB review may be conducted at the site, at Headquarters, or at another location, depending upon the nature and scope of the appraisal and the travel schedule of the QRB members. The draft report may be altered or revised based on the comments and recommendations of the QRB.

In some cases, an appraisal team member may not agree with the report’s contents. If the disagreement cannot be resolved between the team member and team leader, the team member is encouraged to document the issue and submit it to the cognizant Office Director for review. If the disagreement cannot be resolved by the Office Director, the issue will be submitted to successively higher levels of HSS management for evaluation and discussion.

After the QRB review and management approval, the draft report is provided to the responsible field element manager and Headquarters program office representative, as appropriate, for factual accuracy review based on an agreed-upon schedule. In some cases, the draft report may be provided for formal review and comment at the conclusion of an onsite exit meeting. Line management organizations and other responsible DOE organizations may provide draft reports to personnel within their organizations for review. Where multiple organizational layers are involved in reviewing a draft report (e.g., secretarial officer and field element manager), the organizations are expected to provide a consolidated set of comments on the factual accuracy of the draft appraisal report in accordance with the appraisal schedule

## Section 6 – Appraisal Closure

### Introduction

This section addresses responsibilities and tasks for finalizing the appraisal report, developing an appraisal summary, reviewing corrective actions, conducting requested or required briefings, and effecting internal process improvement. All of the responsibilities and tasks addressed in this section apply to inspection activities; some do not normally apply to other types of appraisals, and would be applied only when appropriate.

### Goals

The primary goals of the closure phase are to prepare and disseminate an accurate account of the appraisal results through a final report, conduct appropriate briefings on the appraisal results, provide public information as to a report's existence or availability, and conduct policy issue discussions as necessary with the senior managers of appropriate Headquarters organizations.

### Final Report

All factual accuracy comments received during the formal review and validation phase are reviewed by the appraisal team, and appropriate changes are made to the draft report. In many cases, this requires additional dialogue with site personnel to ensure appropriate resolution of the comments. The final report is typically prepared within ten working days after receipt of the consolidated comments, and then submitted to the Chief, Health, Safety and Security Officer for final approval before issuance.

Distribution of the final report will depend upon the nature and scope of the appraisal activity.

Inspection reports are typically distributed to the cognizant Under Secretary, Assistant Secretary or Deputy Administrator/Associate Administrator, and Field Element Manager, and may be transmitted to the Secretary and/or Deputy Secretary. Independent review reports are typically transmitted to the Field Element Manager with a copy to others in the line management organization or with a vested interest in the appraisal results. Targeted and special review reports that cover activities at multiple sites are generally more widely distributed. All appraisal reports that do not contain classified or controlled unclassified information are posted on an HSS web site. For reports that contain information that cannot be publicly released, the report title is provided on an HSS web site. Any requests for access to those reports that are received by HSS are typically forwarded to the organization subject to the appraisal for a determination on whether the report may be released to the requestor.

### One-Page Summary

For larger appraisals or for reviews covering multiple sites, a one-page summary (“one-pager”) may be prepared that communicates the overall results of the appraisal. For appraisals at a specific site, the one-page summary is validated with site personnel to ensure factual accuracy and provided to the site manager during the closeout phase of the appraisal. The one-page summary is typically used to communicate the results of the appraisal to senior DOE managers. To facilitate communication of appraisal results, Independent Oversight strives to develop one-page summaries that contain only unclassified or controlled unclassified information. An example of a one-page summary can be found in Appendix E.

## Policy Issue Papers

Upon returning to Headquarters, the appraisal team leader completes, if necessary, any policy issue papers and provides them to Director, Office of Enforcement and Oversight, for transmittal to the manager(s) of the appropriate Headquarters organization(s). The Office of Enforcement and Oversight responds, as needed, to requests for discussions or for additional information pertinent to the issue(s) raised.

## Corrective Actions

Responsible DOE managers are required to ensure that corrective actions are developed and implemented to address findings identified in appraisal reports. When the finding addresses DOE policy, the applicable policy organization is required to develop and implement appropriate corrective actions. The corrective actions must be managed and tracked to completion using site- or program-specific issues management processes and systems. DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*, provides the requirements for DOE line management and contractors to manage findings and corrective actions.

If requested by the responsible DOE manager, the appraisal team will review corrective action plans and provide comments to the manager for consideration. In some cases, the Director of the Office of Enforcement and Oversight may require that corrective action plans be submitted to the office for review and comment. This infrequent action is reserved for cases where the safety or security significance of an issue or the extent of its impact across one or multiple sites demands this additional review, or repeated attempts to resolve an issue through corrective actions have been unsuccessful.

The Independent Oversight Program will conduct selected appraisals to review the timeliness and adequacy of corrective actions, verify and validate the effectiveness of corrective actions, and confirm the closure of findings as part of appraisal activities. These appraisal activities will be selected based on the significance and complexity of the finding and the extent and complexity of the actions necessary to address it.

## Briefings

The closure process for appraisals can include a briefing to appropriate managers on the process, results, and conclusions of the activity. Briefings fall into several categories:

- Site briefings, also referred to exit meetings when conducted at the conclusion of onsite data collection activities, provide observations and preliminary results to Federal and contractor managers of organizations undergoing an appraisal. In some cases, a site briefing may be conducted when the draft or final report has been prepared.
- Headquarters briefings may be conducted for key Headquarters managers immediately before or after the final report is issued.
- External briefings to key stakeholders, such as Congressional staff and the DNFSB, are conducted if appropriate only after issuance of the final report, and completion of all internal DOE briefings. The cognizant DOE management for the activities or organizations subject to the appraisal are provided an opportunity to attend these briefings and address the appraisal results.

The need for briefings associated with non-inspection-related appraisals depends upon the specific nature of the activities. The structure, level of detail, and specific content of briefings are tailored to the needs of the audience and the specific information that needs to be communicated. All such briefings will be coordinated with the affected cognizant DOE management.

### **Headquarters Coordination**

As appropriate, the Office of Enforcement and Oversight coordinates with Public Affairs, Congressional liaison, the applicable Under Secretary, affected DOE line management organizations, and the Chief Health, Safety and Security Officer to develop an approach for providing results of appraisals with significant Congressional or media interest to external stakeholders. Individual team members are instructed to not respond to media or other external inquiries directly.

### **Process Improvement**

The Independent Oversight Program consistently strives to improve its internal processes as part of a continuing effort to improve its products and the value it provides to DOE. During the closure phase of each major appraisal, managers are expected to solicit information from team members that can be used for process improvement. The format for such solicitations (questionnaire, roundtable discussion, after-action report) is determined by the responsible managers, and may vary depending on the type of appraisal being reviewed and the perceived need for improvement.

## Section 7 – Records Management

### Introduction

Final appraisal reports provide a formal, permanent record of the results of Independent Oversight Program activities. However, much of the detailed information regarding the conduct of appraisal activities, the results of data collection efforts, and the deliberations and analyses of team members is not specifically included in the final reports. While the Independent Oversight Program’s goal is to include sufficient detail in each report to fully justify its conclusions and enable the report to stand on its own, there is a need to retain some documentation that provides additional information about various aspects of an appraisal activity. Consequently, it is the Independent Oversight Program’s policy to archive certain types of information associated with appraisal activities to enable an accurate response to potential queries for additional detail.

### Records Retention Requirements

The Independent Oversight Program follows the DOE Administrative Records Schedules found at <http://energy.gov/cio/administrative-records-schedules> that are maintained by DOE’s Office of the Chief Information Officer. Records associated with each appraisal activity are assembled and archived for a period of ten years from the date of the final report of the activity. At a minimum, the archives contain the following types of information, in either electronic or hard copy form:

- Inspection/Review Plan
- Correspondence pertinent to the appraisal, as determined by each Office Director
- Performance test documentation, if applicable
- Issue Forms, if utilized
- Site’s written response to any Issue Form utilized
- Final report.

Additional information may be retained as necessary to fully document an appraisal activity. Directors of the Independent Oversight Program subordinate offices identify, in their individual office appraisal process protocol document, the types of records that are to be collected and archived, including the minimum set of records listed above.

## **Appendix A – Professional Conduct**

Independent Oversight Program personnel occupy sensitive and highly visible positions and must maintain the highest standards of personal and professional conduct. While conducting appraisals, team members are considered official representatives of DOE Headquarters. Their behavior must always be beyond reproach. This includes being tactful, courteous, and properly attired. An inspector's conduct should always enhance the professional stature of the appraisal team and the Independent Oversight Program.

While on site, inspectors must follow all local rules, entry and exit procedures, safety regulations, parking requirements, and other employee and visitor guidelines. Inspectors are responsible for familiarizing themselves with all local policies. When in doubt, they should ask their immediate supervisor or the manager of the Independent Oversight Program activity. If they encounter problems or if local requirements alter essential inspection activities, the inspector should inform the independent oversight activity manager as soon as possible.

Inspectors come into contact with numerous individuals during inspection activities, including supervisors, managers, workers, and other site personnel who are not members of the programs being inspected. Independent Oversight Program personnel must be well received and looked upon as professionals. Professional image and support can quickly erode when inspectors openly criticize the site or its personnel or make unfavorable comparisons with other sites. If criticism of the site is warranted, it should be included in the proper section of the inspection report.

Inspectors are responsible for promoting good relations with site personnel. Inspectors work especially closely with points of contact, trusted agents, and operations office, facility, and site Federal and contractor personnel who have been assigned specific inspection support responsibilities. During initial meetings, inspectors should ensure that each of these individuals fully understands what is expected. In dealing with points of contact and trusted agents, inspectors should be open, candid, and straightforward. A close working relationship is necessary and desired, but must be kept on a professional level. Inspectors need to be sensitive to the pressures and stress experienced by the people being inspected. Their stress is amplified further when significant problems are identified. At these times, inspectors can be the object of intense scrutiny, and may be questioned or criticized by personnel from the inspected facility. Establishing good relations at the outset can significantly relieve these stressful situations.

Improper conduct of any kind will not be tolerated. It is important that all inspectors understand that the Office of Health, Safety and Security fully supports the prevention of sexual harassment. All Independent Oversight Program managers and inspectors should be alert to conditions, regardless of how innocent they appear, that could produce an incident of sexual harassment. Immediate action must be taken to correct problems, respond to requests for assistance, and prevent future occurrences. It is imperative that all Independent Oversight personnel understand their right to a harassment-free work environment and their responsibility for eliminating conduct that could lead to sexual harassment. One of the most important factors in determining what constitutes "unwelcome behavior" and "sexual conduct" is that it depends more on effect than intent, and effect can only be determined by the recipient. Thus, whether the perpetrator intentionally or unintentionally sexually harasses another person is not the only issue. How that behavior is received is central in determining whether harassment took place.

Team members may socialize and relax at appropriate times and locations while on inspections. However, these activities must be in good taste. Inspectors must be particularly circumspect when

socializing with personnel or friends from the inspected facility to minimize the chance of social contacts being perceived as compromising the objectivity of the inspection.

Contractors serving as inspectors must be extremely careful to avoid any conflict of interest, potential conflict of interest, or appearance of a conflict of interest. Discussing future work possibilities at the site, mentioning individual or corporate capabilities and experience as they apply to current site problems, and any other similar activity is unacceptable. Such actions cast doubt on inspection objectivity and the Independent Oversight Program's mission, and can result in the inspector's removal from the site. If any potential conflict of interest is encountered, it must be reported to the responsible Office Director immediately.

The information provided in this section is not intended to be an exhaustive discourse on personal and professional conduct, or on ethical standards. The intent is to provide a condensed treatment of these subjects as they pertain to the Independent Oversight Program. On the whole, professional conduct stems from good judgment, consideration for others, civility, and a genuine concern for the prestige of the organization one represents. Inspectors should treat others the way they themselves wish to be treated, and should behave and dress in a way that presents the best possible image of their capacities. It follows, therefore, that a highly visible organization responsible for inspection and oversight of programs designed to protect some of the most critical elements in existence, nuclear weapons and material, would expect the highest standards of conduct from those who represent it.

#### **A Standard of Professional Conduct for Independent Oversight Program Personnel**

- As an official representative of DOE Headquarters, your behavior should always be beyond reproach.
- Be tactful, courteous, and properly attired.
- While on site, comply with all local rules and regulations.
- Avoid criticizing the site or site personnel.
- Avoid adversarial relationships.
- Be sensitive to the pressures and stress experienced by the people being inspected.
- Establish good relationships with site personnel.
- Avoid actions that could be interpreted as sexual harassment.
- Be discreet when socializing.
- Avoid any conflict of interest or appearance of conflict of interest.
- Keep all initial planning internal to the Office of Enforcement and Oversight.
- Develop a good, professional relationship with points of contact and trusted agents.

## Appendix B – Appraisal Selection, Prioritization, and Scheduling

### Purpose

This appendix describes the approach employed by the Independent Oversight Program to establish oversight and appraisal priorities and the frequency of inspections for those activities and assets subject to periodic independent oversight evaluations.

### Overview of Selection, Prioritization and Scheduling Process

The Independent Oversight Program employs a formal process through which it prioritizes its appraisal activities based on a standard set of criteria for each of three disciplines, - safeguards and security, cyber security, and safety/emergency management. For safeguards and security and cyber security, the priority assignments are used to develop appraisal schedules by providing a guideline for determining how often a site will be subject to scheduled Independent Oversight appraisal activities. For safety and emergency management, the priority designation generally correlates to the level of coverage that is provided for the site under the Site Lead Program.

However, a number of factors (e.g., a facility's recent inspection results; changes in management approaches, contractual arrangements, or protection strategies or technologies; new safety or security-related initiatives; recent site, Departmental, or national events; and available resources) may affect how often a given site is subject to a particular appraisal.

### Priority Assignment Process

Each site subject to independent oversight is associated with a priority designation that is based on the various criteria described below. These criteria are applied using available empirical data and the professional judgment of Independent Oversight Program staff. A review of a site's priority designation is conducted when significant changes occur in the site's physical plant, mission, or operations. The standard set of criteria is used to determine site status and the priority designation may be changed as appropriate.

### Criteria for Determining Safeguards and Security Priority Designations

- Priority I: Sites with high-value assets or with high risk; includes all sites with Category I special nuclear material in accessible and transportable form. These sites are typically inspected every 24 to 30 months.
- Priority II: Sites with medium-value assets or with medium risk; includes Category II or III special nuclear material in accessible and transportable form. These sites are typically inspected every 36 to 48 months.
- Priority III: Sites with primarily non-national defense missions and no Category I or II quantities of special nuclear material. These sites are typically inspected only in response to significant or recurring security incidents.



Other factors to be considered in determining the priority:

- Amount of special nuclear material present on site
- Amount and sensitivity of classified matter on site
- Amount and sensitivity of controlled unclassified information on site
- Other assets that require protection
- Identified risks/risk levels associated with the protection system
- Compensating or mitigating factors
- Management and program stability (e.g., contract changes, reductions in force, changes in program implementation approaches, newly deployed technologies).

#### Criteria for Determining Cyber Security Priority Designations

Priority I: Major weapons production sites, weapons laboratories, and scientific laboratories with large classified computer networks containing high-value information assets, and/or information systems requiring a high degree of assurance of data integrity or availability. These sites are typically inspected every 24 to 30 months.

Priority II: Sites with classified computing assets and substantial unclassified computer networks containing controlled unclassified information, and/or information systems requiring a high or moderate degree of assurance of data integrity or availability. These sites are typically inspected every 36 to 48 months.

Priority III: Sites with only unclassified computer networks and a limited amount of controlled unclassified information, with most systems only requiring a low degree of assurance of data integrity or availability. These sites are typically inspected only in response to significant or recurring cyber security incidents or upon request.

Other factors to be considered in determining the priority:

- Amount and sensitivity of classified information (e.g., Restricted or Formerly Restricted Data, weapons design information)
- Amount and sensitivity of controlled unclassified information (e.g., personally identifiable information, Unclassified Controlled Nuclear Information, Official Use Only information)
- Use of supervisory control and data acquisition (SCADA) systems for control of large scale electrical power distribution or control of critical nuclear and non-nuclear facility operations
- Effectiveness of management, operational, and technical controls to mitigate cyber security risks
- Compensating or mitigating factors
- Management and program stability (e.g., contract changes, changes in program implementation approaches, network reconfigurations, susceptibility to new threats, newly deployed technologies).

### Criteria for Determining Safety and Emergency Management Priority Designations

- Priority I: Sites with numerous Category 1 and 2 nuclear facilities or such facilities being constructed, or facilities that otherwise have the highest potential for offsite exposure risk to the public and the highest onsite exposure risk to collocated workers from active nuclear and radiological facilities. These sites have a designated site lead\*.
- Priority II: Sites with few Category 2 nuclear facilities, Category 3 nuclear facilities, or facilities or activities that pose a significant onsite exposure risk to collocated workers from active nuclear and radiological facilities. These sites have a designated site lead\*.
- Priority III: Sites that have little or no potential for offsite risk to the public or to collocated workers because of the lack of active nuclear and radiological facilities.

\* Site leads are designated Office of Safety and Emergency Management staff who monitor site nuclear operations and activities to support risk-informed decision-making on appraisal scopes, priorities, and schedules.

Other factors to be considered in determining the priority:

- Current operations – current types and levels of activities (e.g., construction, facility modification, new operations, production, re-starts, remediation, decontamination, and decommissioning)
- Process complexity – complexity (and uniqueness, if applicable) of activities at the facility
- Facility conditions – general material/physical condition of facilities (e.g., age of facilities and equipment, life cycle considerations)
- Hazards – hazards at the facility that could adversely affect workers, the public, or the environment (e.g., fissile or radioactive materials, chemicals, industrial hazards, or waste)
- Compensating or mitigating factors
- Management and program stability (e.g., contract changes, significant increases or reductions in force, new cleanup campaigns, changes in hazard abatement methodologies).

### Schedule Development Process

Annually, approximately six months prior to the beginning of the new calendar year, the subordinate oversight offices:

1. Identify periodic inspection and other review requirements (e.g., follow-up activities, targeted review topics, or special reviews) in their areas of interest for the following calendar year. This strategic planning phase considers input from other HSS offices that is gained throughout the year through such entities as the HSS Nuclear Safety Coordinating Committee and HSS Security Coordinating Committee. The objective of this phase is to outline major appraisal activities that require significant advanced planning, recognizing that many appraisal activities are also

scheduled and planned with much shorter lead times based on changing conditions, the stage of a particular activity or operation, and ongoing observations of performance.

2. Coordinate with the cognizant line managers to ensure that independent oversight activities are integrated into line management assessment schedules. This typically includes meeting with points of contact in the Headquarters Program Offices to ascertain overall Program Office priorities, plans, and schedules for line oversight activities in the coming year and then coordinating with site managers and staff to identify optimal time frames.
3. Submit the proposed activities and a general schedule to the Director, Office of Enforcement and Oversight, and Chief Health, Safety and Security Officer for approval.
4. Conduct coordination with Headquarters, field managers, and key points of contact to identify scheduling conflicts to be addressed.

Upon approval and coordination of activity dates, normally by November 1 of each year, the schedule for the following calendar year is provided to affected Headquarters and field elements.

## Appendix C – Sample Appraisal Plan

This appendix provides an example of the types of information that may be included in an appraisal plan. Plans will vary in the level of detail and sequence of information based upon the specific type of appraisal to be conducted and the office or offices conducting it.

**DEPARTMENT OF ENERGY  
OFFICE OF HEALTH, SAFETY AND SECURITY  
OFFICE OF ENFORCEMENT AND OVERSIGHT  
PLAN  
FOR [APPRAISAL TYPE] OF [TOPIC]  
AT THE [\_\_\_\_] SITE OFFICE AND [SITE]**

**Date**

Approved by:

\_\_\_\_\_  
Appraisal Team Leader

\_\_\_\_\_  
Date

\_\_\_\_\_  
Director  
[Subordinate Oversight Office]

\_\_\_\_\_  
Date

\_\_\_\_\_  
Director  
Office of Enforcement and Oversight

\_\_\_\_\_  
Date

**DEPARTMENT OF ENERGY  
OFFICE OF HEALTH, SAFETY AND SECURITY  
OFFICE OF ENFORCEMENT AND OVERSIGHT  
PLAN  
FOR [APPRAISAL TYPE] OF [TOPIC]  
AT THE [\_\_\_\_] SITE OFFICE AND [SITE]**

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Attachment: Appraisal Team Composition

NOTE: Appraisal Criteria, Activities, and Lines of Inquiry are maintained on an HSS web site

**DEPARTMENT OF ENERGY  
OFFICE OF HEALTH, SAFETY AND SECURITY  
OFFICE OF ENFORCEMENT AND OVERSIGHT  
PLAN  
FOR [APPRAISAL TYPE] OF [TOPIC]  
AT THE [\_\_\_\_] SITE OFFICE AND [SITE]**

**I. INTRODUCTION**

This document outlines the activities currently planned by the [subordinate Oversight Office], within the Office of Health, Safety and Security (HSS), for [topic] activities at the [Site]. Additionally, the [subordinate Oversight Office] will evaluate activities at the [\_\_\_\_] Site Office that directly support the [Site] [topic] program. This [appraisal type] will be conducted in accordance with DOE Order 227.1, *Independent Oversight Program*, which establishes the foundation for the Program's appraisal activities, appraisal process guidance that is available at <http://www.hss.doe.gov/indepoversight/>, and this plan. While this plan outlines projected evaluation activities, it should be understood that changes to specific activities and inspection focus areas may be made in response to emerging concerns and requests from key Site Office, [Site], and Headquarters managers. Site representatives will be kept informed of significant changes in proposed activities and appraisal focus areas.

**II. BACKGROUND**

In [date], the [subordinate Oversight Office] conducted a review of [topic] at the [site/facility]. The review resulted in [#] findings and provided a number of opportunities for improvement for line management to consider as the project transitioned from commissioning to operations. Since that time, the contractor has completed corrective actions from the [date] review, prepared updated hazard analysis documentation, and begun pre-operational testing of the project's major facilities and equipment.

The results of this [appraisal type] will also be used to support a broader evaluation of the quality of pre-operational readiness testing across the Department based on reviews conducted at multiple sites. A roll-up report of the results of those reviews is expected to be published by the end of this calendar year.

**III. SCOPE**

This review will focus on selected elements of a [discipline] program as described in DOE Order [X]. Performance effectiveness will be evaluated against applicable national standards, program and site office procedures, and locally approved [site] program plans and operating procedures [include a list of specific relevant requirements document as appropriate]. To achieve the objectives of this appraisal, the following topical areas will be evaluated:

[Listing the subtopics/program elements subject to review]

#### IV. SCHEDULE

The appraisal process is divided into several stages, including offsite and onsite planning, onsite review activities, report writing, and validation and closeout. Offsite planning for this appraisal will include brief discussions with site personnel to understand the current organization and operations, a request for and review of relevant site procedures and other documents, preparation of performance test plans and agreements, and designation of and coordination with trusted agents. The onsite portion of the appraisal will be conducted [dates]. During this period, activities such as interviews, facility walk-downs, limited-scope performance tests, and document reviews will be conducted. Following completion of the onsite activities, a draft report will be prepared and made available to line management for review and feedback. The overall schedule is provided below.

Scoping Visit	[Dates]
Planning Visit	[Dates]
Onsite Data Collection	[Dates]
Report Preparation and Validation	[Dates]
Draft Report Comments Due	[Dates]

#### V. TEAM RESPONSIBILITIES AND ASSIGNMENTS

[Name/Title] will be the senior DOE official managing the appraisal activities and the primary point of contact with site management. He will be assisted by a staff of technical specialists and administrative support personnel. The team leader and staff will ensure that the appraisal is conducted fairly and in accordance with this plan.

The team will be divided into several subject/topical areas as follows:

[list team composition, assignments, and contact information or provide in an appendix]  
DOE Order 227.1 assigns responsibility to the Heads of Field Elements to assist the Office of Enforcement and Oversight in performing an effective and valid appraisal. This responsibility includes the provision of (1) site access and support, (2) points of contact, and (3) validation of the factual content of the appraisal data and report.

#### VI. APPRAISAL PROCESS

##### Independence

The Office of Enforcement and Oversight is charged with implementing an Independent Oversight Program for DOE safety and security programs. Independence is assured by its direct reporting relationship through HSS to the Secretary of Energy (i.e., outside any line management reporting chain). Further, the Independent Oversight Program does not have any direct responsibility for site operations, policy formulation, or safety or security program implementation.

The Office of Enforcement and Oversight exercises independence in the conduct of appraisals. Scheduling is independent of line management, although line management oversight schedules and activities are considered when planning and selecting independent oversight activities, and valid concerns of site and DOE management are accommodated whenever possible. Inspections are performance-based assessments of site implementation of the requirements established in Federal,

state, and local regulations and DOE directives. The Independent Oversight Program may also provide feedback on the effectiveness of regulations and directives and whether they adequately establish effective program requirements.

### **Data Collection**

This appraisal team will utilize the following Criteria, Review and Approach Documents and/or lines of inquiry to facilitate data collection. These documents are available on [provide web address if applicable].

### **Appraisal Closeout**

The appraisal process will culminate in the issuance of a report that documents the scope and results of the appraisal. Line management will be provided a draft report for factual accuracy review and comment prior to issuance of the final report. The report may identify “findings,” which are used to communicate significant deficiencies or safety or security issues that warrant focused attention on the part of management.

Findings are clearly identified in the appraisal report, define the specific nature of the deficiency, clearly indicate whether the deficiency is localized or indicative of a systemic problem, and identify which organization is responsible for corrective actions. Appraisal reports may use terminology other than “findings” to be consistent with terminology used by program or site-specific issues management systems to identify items of an equivalent nature. Findings or their equivalent must be addressed through corrective actions and managed in accordance with the issues management process that [organization/site] has implemented in accordance with DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*.

The appraisal report may identify other deficiencies that do not rise to the level of a finding. These deficiencies or issues are expected to be evaluated by line management for correction and entry into applicable issues management systems. Most appraisal reports also identify opportunities for improvement. Opportunities for improvement are suggestions offered by the appraisal team that may assist in identifying options and potential solutions to various issues identified during the conduct of the appraisal.



**OFFICE OF ENFORCEMENT AND OVERSIGHT  
[SITE] APPRAISAL TEAM**

**Dates**

Team Leader

Team Members

Administrative Support

## Appendix D – Interview Techniques

The interview is an invaluable instrument for obtaining data and information. Although there are several different types, Independent Oversight Program inspectors are primarily interested in the data determination interview, which is used to secure data and information from the interviewee. Each interview will be different depending on the type of interview, the parties involved, and the complexity of the topics discussed. However, to be successful, every interview should be two-way and *properly planned*.

Frequently, the goals of the two parties involved in an interview may be dissimilar or even opposite. One of the purposes of the interview would then be to find a common ground for discussion. At times, the personalities of the individuals involved may be quite different, which can create challenges. To alleviate, if not eliminate, these types of issues, the inspector needs to plan the interview, designate and communicate the objectives to be achieved, and be sensitive to the other person's needs and feelings. During the interview, the inspector also needs to listen intelligently and understandingly and use interviewing tools effectively.

### Planning the Interview

Interviews are more successful if time is taken to establish objectives and review general methods and techniques. Independent Oversight Program inspectors are expected to devote time and effort to the following areas.

#### Purpose

Inspectors should refrain from discussing too wide a variety of topics or cover topics that are not applicable to the appraisal. This is not an efficient use of time and may unnecessarily generate confusion or misunderstanding. Inspectors must be flexible during an interview, but it is also critical to plan ahead. The inspector should consider establishing objectives with the interviewee to facilitate securing pertinent facts, reaching decisions, or selecting a specific course of action to obtain additional information.

#### Research

Interview time is typically limited and therefore the time with the interviewee must be used efficiently to accomplish the interview objectives. Inspectors are expected to maximize their time spent discussing and understanding the key objectives of the interview by having done their "homework" in reviewing relevant documents ahead of time and having important reference sources on hand during the interview.

#### Key Questions

The benefit from any interview will be maximized if interviewees are willing and able to express themselves freely. In many cases, this may be achieved by asking the right kinds of questions. Queries such as "How would you reorganize the operation?" or "What action do you recommend for solving the problem?" may motivate the interviewee to respond openly and freely.

## Sensitivity

The inspector should recognize the interviewee's perceptions, expectations, and personality. Everyone reacts to interviews differently. Some will respond openly and freely with one approach; others may respond better to another. A moment or two spent prior to the discussion in attempting to determine the individual's personality, perceptions, and needs is often time very well invested.

There are other actions that the inspector may take to prepare for the interview. The point is that proper planning will almost always result in a fruitful interview.

## The Interview in Action

Inspectors typically adapt the interview to the persons involved. However, in every instance, it is important to use the following tools of interviewing to their maximum effectiveness:

- Questioning
- Listening
- Observing
- Evaluating.

More specifically, the inspector should attempt to:

1. **Establish a comfortable climate.** When people are treated courteously, honestly, and respectfully, they usually respond positively. If the exchange is to be open, honest, and free, the climate must help to attain those goals.
2. **Articulate the purpose of the interview.** It is helpful to both parties if a common understanding is reached as to the purpose of the interview and the subjects or issues to be discussed.
3. **Obtain the interviewee's input.** Because of the nature of inspections, there can be a tendency on the part of both the inspector and the interviewee to allow the inspector to dominate the discussion. This is not desirable. The interviewee should participate freely and thoroughly. Without this participation, it will be difficult for the inspector to gather the data necessary to accurately evaluate the area being inspected.
4. **Question, listen, observe, evaluate.** These points are the keys to a successful interview. Questions should be carefully worded and should elicit a response from the interviewee beyond “yes” or “no.”. Since the purpose is to gather facts and information, the inspector should refrain from arguing, correcting, explaining, or preaching. It is a time to listen—listen attentively, understandingly, skillfully, and sensitively. While listening, the inspector should also observe the nonverbal communication of the interviewee. With tactful questioning, sensitive listening, and thoughtful observation, the inspector should be positioned to accurately evaluate the information that is being conveyed.
5. **Terminate effectively.** Interviews should not be terminated abruptly so that whatever cooperative climate was developed between the inspector and interviewee is not lost or diminished. An effective conclusion to the interview is important. A recap of the key points noted by the inspector is an effective way to end the discussion and gives the interviewee an

opportunity to provide any needed clarification or suggest additional sources of relevant information.

The interview can be among the most important of all the inspector's data collection tools. It provides an excellent method for determining facts and confirming or refuting information gathered.

Interviews require time, but this is usually time well spent. A good exchange will often give the inspector valuable information and put the interviewee at ease regarding the objectives of the appraisal and interview. Interviewees have the opportunity to express themselves and the satisfaction of having someone listen. This is particularly true if the individuals being inspected are proud of their achievements and their areas of responsibility.

Table D-1 summarizes the protocols for conducting effective interviews.

**Table D-1. Interview Protocols**

- Prepare questions and lines of inquiry in advance.
- Schedule interviews well in advance and arrive for interviews promptly.
- Explain the purpose of the interview.
- Do not "lead" interviewees in answers and conclusions.
- Conduct interviews in the interviewees' work location whenever possible to promote easy access to applicable documents and minimize disruption in the employee's work day.
- Limit team attendance to one or two interviewers unless a group interview is being conducted. The number of interviewers should not overwhelm the interviewees. Limit attendance by line personnel to the individual or individuals being interviewed, unless the interviewee requests the attendance of a manager or union representative. In most cases, to ensure an open and candid interviews and exchange of information, requests from individuals, including managers, to attend interviews are not normally entertained unless specifically requested by the interviewee.
- Ask other attendees not to respond to questions asked of the interviewee but to provide only advice and support to the interviewee.
- Pace questions to allow a full response, and avoid creating a threatening or anxious atmosphere, particularly when multiple interviewers are involved.
- Question tactfully, listen sensitively, observe thoughtfully, and evaluate accurately.
- Provide the interviewee an opportunity to ask questions about the interview or the appraisal process.
- Take good interview notes. Do not rely on memory.
- Summarize the interview at the end to assure that interviewer conclusions and interviewee concerns are appropriately captured.

## Appendix E – Sample Issue Form and One-Page Summary

### E.1 Issue Form Use and Sample

In accordance with DOE Order 227.1, the Office of Enforcement and Oversight is required to notify the cognizant DOE manager verbally as soon as possible and in writing within 24 hours when appraisal activities indicate one of the following conditions:

- An imminent danger or condition that presents an unacceptable immediate risk to workers, public health, or the environment, or
- A major vulnerability (e.g., unacceptable risk of special nuclear material theft or diversion, radiological or industrial sabotage, espionage, or significant compromise of classified information).

A sample issue form, shown on the next page, can be used during inspections and reviews to document and communicate these conditions. However, preparation of the issue form must not delay verbal notifications to line management.

The issue form can also be used at the discretion of the team leader to document emerging significant issues. The team leader should consider using the issue form to:

- Document and communicate particularly complex issues to the site being evaluated
- Document weaknesses requiring time-critical mitigative and/or compensatory actions by site personnel
- Solicit a written response from line management on a time-critical issue associated with an inspection activity to aid the team's understanding of the site's perspective
- Help improve communications among the appraisal team, DOE line management, and contractors regarding, for example, a particularly contentious issue.

**INDEPENDENT OVERSIGHT PROGRAM  
ISSUE FORM**

The purpose of this issue form is to convey to cognizant managers potentially significant information from an ongoing Independent Oversight Program appraisal activity and solicit feedback. It is requested that additional information that may shed light on this issue (including mitigation actions, if appropriate) be provided, along with management's comments on factual accuracy. The information conveyed by this issue form is preliminary data that is not meant to communicate the entire picture of performance for a program or at a site. Consequently, this form should be provided only to those who have a need to know the information, and used only in the context of ensuring effective communications among cognizant DOE management, the site, and the Office of Health, Safety and Security.

SITE: \_\_\_\_\_

SUBJECT: \_\_\_\_\_

Notification of a imminent danger or major vulnerability in accordance with section 4.e. of DOE Order 227.1? Yes \_\_\_\_\_ No \_\_\_\_\_

1. Issue:

2. Impact:

3. Requirement/Standard:

Originating Team / Staff Member \_\_\_\_\_ Date \_\_\_\_\_

**Approval:**

Team Leader / Office Director \_\_\_\_\_ Date \_\_\_\_\_

## E.2 Sample One-Page Summary

Depending upon the scope, a one-page summary (the “one-pager”) may be prepared to communicate the “positive attributes” or strengths and the “issues requiring attention” or weaknesses found during an appraisal or a series of appraisals. The one-page summary must be validated with the organizations evaluated to ensure factual accuracy. After appraisal closure, the one-page summary can be used to communicate the results of the appraisal to senior DOE managers. An example is shown below.

### **INDEPENDENT OVERSIGHT PROGRAM HIGHLIGHTS OF THE [DATES] INDEPENDENT REVIEW OF [TOPIC] AT THE [SITE]**

The following information provides a summary of the results of the Independent Oversight review. Line management, including the [Organization] and [Organization] management and operating contractor, has reviewed the results contained in this summary.

#### **Positive Attributes**

- Since the previous Independent Oversight appraisal, [Organization] has made significant progress in strengthening their oversight processes in such areas as staff capabilities, the Facility Representative program, the Safety System Oversight program, the Technical Qualification program, and the Operating Experience/Lessons Learned program.
- [Organization] has substantially improved its safety basis processes and documentation for nuclear facilities. The additional safety basis analyses were an important aspect of [Organization] successful efforts to address most nuclear safety system functionality findings from the previous Independent Oversight review.
- The [Organization] has improved the descriptions of and adherence to specific administrative controls and has developed and implemented an innovative method for tracking surveillance requirements and trending the results to better detect potentially anomalous conditions.

#### **Issues Requiring Attention**

- Some [Organization] organizations do not have a defined work control process, while others rely upon mechanisms that are not adequate to communicate hazards and controls to workers. [Organization] efforts to establish work planning and control processes have not been effective for all areas in ensuring that the requirements are always understood, accepted, and effectively implemented for all work activities.
- Weaknesses are evident in a number of aspects of essential safety systems. The [Facility] safety basis has potential non-conservatism in defining a bounding condition for reactor fuel cladding. Implementation of DOE requirements for configuration management, the cognizant system engineer program, and safety software quality assurance for various facilities have not been timely. Formality of some activities needs improvement.

- Although progress has been made, feedback and improvement processes have not been fully implemented. [Organization] establishment of a fully effective assurance system has been hindered by weaknesses in the analysis of deficiencies, communication of requirements, and insufficient attention to the adequacy of implementation. Some system-based Site Office oversight program elements are not yet sufficiently mature and/or fully functional. The [Organization] contractor assurance system, essential to the Site Office model for oversight program effectiveness, is in need of improvement.



## **Appendix F – Reporting Formats and Objectives**

To meet its oversight obligations, the Independent Oversight Program conducts numerous activities of varying scope and intensity. These include periodic inspections, risk-informed and site-tailored independent reviews, multi-site targeted reviews, and operational awareness activities. The Independent Oversight Program also conducts such activities as special reviews, special studies, and follow-up reviews. These activities share some common elements, but each type of activity is also different in significant ways. It is appropriate that the reports issuing from these various activities be tailored to best represent and communicate the essential facts relating to the activity.

Appraisal reports represent the primary product of the Independent Oversight Program. If appraisal teams do not do a good job of reporting, the considerable effort and resources devoted to planning, data collection, and analysis will not achieve the ultimate objective of providing information that can be used to make improvements. Independent Oversight appraisal reports provide information about what was done, what was found, the significance of what was found, areas that are in need of corrective actions and management attention, and suggestions on methods for improving performance. This information is intended to benefit the managers, supervisors, and staff who administer and operate the various programs.

The majority of reports that the Independent Oversight Program produces can be divided into three categories:

- Long reports, often including numerous appendices and containing considerable detail, such as inspection reports
- Shorter reports, often 5 to 25 pages, usually associated with independent reviews and follow-up reviews
- Activity reports that are used to document operational awareness activities or short-duration site visits

For longer reports that address multiple program areas or organizations, or contain considerable technical detail, an executive summary or similarly formatted front section of the report may be utilized. The summary incorporates the essence of the significant details provided in the body of the report or its appendices, an overall analysis of program status and needs, and conclusions regarding the adequacy of the program(s) evaluated. It must include sufficient information for senior managers, in particular, to understand the significance of any issues or weaknesses identified and the potential impacts, short and long-term, of not addressing those issues. It may also include recommendations for addressing the most important, and typically systemic, areas of weakness. The executive summary is typically five to ten pages long.

For shorter reports documenting more narrowly-scoped activities, the results are typically provided in the body of the report without an executive summary or front section. The body of the report typically includes the following sections:

- Purpose – describing the reason the activity was conducted and its objective
- Background – providing context for the activity, such as the status of relevant site operations and results of prior evaluations
- Scope – programs, facilities, subjects, topical areas, and/or organizations evaluated

- Results – observations, discussion, and characterization of the areas evaluated
- Conclusions – an overall assessment of the areas evaluated and the impact of any deficiencies identified
- Opportunities for Improvement or Recommendations – items for management consideration in improving performance
- Findings (if applicable) or Items for Independent Oversight Follow-up – weaknesses that require corrective action or areas that will continue to be monitored by Independent Oversight Program staff and/or re-evaluated during a subsequent appraisal

Guidance for preparing an executive summary is provided in Section F.1. An example format for an activity report is provided in Section F.2.

## **F.1 Guidance for Preparing Executive Summaries**

### **INTRODUCTORY and BACKGROUND INFORMATION**

Introductory and background information typically includes:

- The type of appraisal activity that was conducted, where and when it was conducted, and by whom
- The scope of the activity
- The reason for the activity (e.g., past problems, response to a request or Secretarial direction, special event, routine periodic activity, part of a broader series of reviews) and, if appropriate, limited background information concerning past performance and status of corrective actions
- Any other information necessary to prepare the reader for the information that follows.

This information should be provided as succinctly as possible, and may range in length from a minimum of a single paragraph to several paragraphs.

### **RESULTS**

The results section will be organized logically based on the scope of the appraisal. It is usually divided into sub-sections with section titles that reflect how the information is organized. For example, if the appraisal evaluated multiple, distinct organizational entities, such as the Headquarters program office, site office, and site contractor, or multiple site contractors implementing a common program, the results may be best suited to presentation by organization. For an appraisal covering a single organization but multiple topical areas, or a single contractor and multiple facilities, it may be best to present the results according to topical area or facility. In any case, the results should be organized in the manner that best facilitates a clear understanding of any issues identified.

The results section of an executive summary is intended to highlight the most significant outcomes of the evaluation, both positive and negative. Positive aspects may include initiatives or continuing good performance in a program area, appropriate management attention devoted to a particular issue or area, and successful actions taken to correct past deficiencies. Provide enough information to enable the reader to understand what has been accomplished, and why the things that are being done are positive or the benefits that have been realized. Discussions of weaknesses should focus on those that warrant management attention or corrective action. Provide enough detail for the reader to understand the nature and gravity of the deficiency and why it is important that it be corrected. The summary should also refer to any mitigating circumstances, compensatory measures, or immediate corrective actions that have been

implemented. Provide sufficient descriptive information without duplicating the detail contained in the body of the report.

The information in each sub-section may require as little as a single paragraph, or up to several paragraphs. Be brief, but include enough context to get the necessary points across. Use of bullets here is acceptable, and the “bolded bullet” approach (i.e., a bold topic sentence that provides the essence of the positive attribute or weakness/issue, followed by supporting detail and examples) is often effective.

## **CONCLUSIONS**

This section should briefly state the overall conclusions drawn from the appraisal activity. It should discuss overall program status if such a characterization is relevant to the scope of the appraisal activity. It may indicate whether the program is showing an improving or declining trend, and should identify areas that may require significant management attention. The bottom line regarding program adequacy should be stated here. The conclusion discussion can often be limited to a single paragraph. It may be followed by a table or listing of the report’s findings and/or recommendations. If the activity is rated, the rating and the rationale for the rating should be described here.

### **F.2 Example Independent Activity Report**

An Independent Activity Report may be utilized to document or communicate information gained from observing a meeting, visiting a site, or monitoring how a particular issue is addressed. The report will briefly describe the activity observed and/or facility visited, and the impact of any observations. In some cases, the report will be used to provide feedback to those managing the activity observed, and communicate items that the Independent Oversight Program intends to observe or evaluate during a follow-up activity. Independent Activity Reports are validated with the appropriate points of contact before being filed or posted to an HSS web site.

HSS Independent Activity Report - Rev. 0		Report ID: HIAR- XXXX-####-##-##-##																												
<b>Site:</b> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Enter the full name of the site where the activity took place.</div>	<b>Subject:</b> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Provide a brief phrase to capture the subject of the activity to fit in this field.</div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">Use a consistent 3 to 4 letter code to identify the site (e.g., HRL = Hanford Richland Operations Office; HORP = Hanford Office of River Protection; INL = Idaho National Laboratory), followed by the 4-digit year, 2-digit month, &amp; 2-digit day on which the activity ended. Finally, include a sequential 2-digit identifier (e.g., 01, 02, 03, etc.) to enable an allowance for more than one review ending on the same day at the same site; separate all by a hyphen.</div>																												
<b>Dates of Activity:</b> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Enter the dates in the following format: XX/XX/XXXX - XX/XX/XXXX</div>	<b>Report Preparer:</b> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Concisely discuss the purpose of the activity and generally characterize what was done.</div>		<div style="border: 1px solid black; padding: 5px;">Enter the full name of the person who is providing the detailed information for input into the report.</div>																											
<b>Activity Description/Purpose:</b> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Concisely discuss the purpose of the activity and generally characterize what was done.</div>		<div style="border: 1px solid black; padding: 5px;">Concisely discuss the outcome of the activity that was described in the field above.</div>																												
<b>Result:</b> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Provide the full name of all HSS participants involved in the activity; be sure to show the Team Lead first. Consider including the office code for each member to provide additional clarity.</div>		<div style="border: 1px solid black; padding: 5px;">List each reference document, if applicable, that was used to perform the given activity.</div>																												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">HSS Participants</th> <th style="text-align: left;">References</th> </tr> </thead> <tbody> <tr><td>1 (lead)</td><td>1</td></tr> <tr><td>2</td><td>2</td></tr> <tr><td>3</td><td>3</td></tr> <tr><td>4</td><td>4</td></tr> <tr><td>5</td><td>5</td></tr> <tr><td>6</td><td>6</td></tr> </tbody> </table>	HSS Participants	References	1 (lead)	1	2	2	3	3	4	4	5	5	6	6	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">HSS Participants</th> <th style="text-align: left;">References</th> </tr> </thead> <tbody> <tr><td>1 (lead)</td><td>1</td></tr> <tr><td>2</td><td>2</td></tr> <tr><td>3</td><td>3</td></tr> <tr><td>4</td><td>4</td></tr> <tr><td>5</td><td>5</td></tr> <tr><td>6</td><td>6</td></tr> </tbody> </table>	HSS Participants	References	1 (lead)	1	2	2	3	3	4	4	5	5	6	6	<div style="border: 1px solid black; padding: 5px;">Identify whether or not there were any items that were identified during the activity that will need additional attention after the conclusion of the activity.</div>
HSS Participants	References																													
1 (lead)	1																													
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Were there any items for HSS follow up? Yes <input checked="" type="radio"/> No <input type="radio"/>																														
<b>HSS Follow Up Items</b>																														
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2   																														
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<div style="border: 1px solid black; padding: 5px;">Follow Up Items are intended to be matters that were identified during the activity that, when addressed by HSS, will serve the purpose, add value to the result, and/or enhance the effectiveness of the given activity (e.g., plan a future visit, coordinate with a counterpart, obtain a facility document, etc.) These items are not generally issues, concerns, or findings that would need to be tracked.</div>																														