



Chief of Nuclear Safety (CNS) Standard Operating Procedure

Site Interaction and Assessment Review Process

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Section 1 Introduction

1.1 Purpose/Summary

This Standard Operating Procedure (SOP) provides a consistent methodology for interacting with and providing assessment support to the various sites under Central Technical Authorities (CTA) cognizance in support of the CTA responsibilities associated with maintaining operational awareness.

1.2 Applicability

This procedure is applicable to all Chief of Nuclear Safety (CNS) activities related to site interaction and assessment activities associated with high hazard, high consequence DOE nuclear facilities. Specific examples of several of these types of activities include:

- a) Operational Readiness Reviews
- b) Readiness Assessments
- c) Independent Technical Reviews
- d) Oversight Assessments
- e) Quality Assurance and Software Quality Assurance Assessments
- f) Integrated Safety Management (ISM) Verification Assessments

1.3 References

- a) DOE Implementation Plan for DNFSB Recommendation 2004-1, Revision 2, October 12, 2006
- b) Department letter to DNFSB declaring the Central Technical Authority (CTA) has adequate technical support reporting completion of Commitment 2 in the DNFSB 2004-1 Implementation Plan Revision 2, dated October 30, 2006
- c) DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*
- d) DOE P 226.1, *Department of Energy Oversight Policy*
- e) DOE O 425.1C, *Startup and Restart of Nuclear Facilities*
- f) DOE P 450.4, *Safety Management Policy*
- g) DOE-STD-3006-2000, *Planning and Conduct of Operational Readiness Reviews*
- h) DOE O 414.1C, *Quality Assurance*
- i) DOE P 450.4, *Safety Management System Policy*

j) DOE M 450.4-1, *Integrated Safety Management System Manual*

1.4 Contact Information

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Section 2 Roles and Responsibilities

2.1 Chief of Nuclear Safety (CNS) Staff Startup and Restart of Nuclear Facilities

CNS staff maintains operational awareness with respect to the scheduling, planning, and performance of operational readiness reviews and readiness assessments for startup and restart of high hazard, high consequence DOE nuclear facilities.

2.2 CNS Site Leads

CNS Site Leads provide site liaison for maintaining operational awareness at the various sites within the DOE complex under the cognizance of the CTA.

The Site Lead has the primary responsibility to remain aware of the current site assessment schedule and coordinates CNS staff participation to the greatest extent possible in assessments at their site with nuclear safety relevance. Additionally, the Site Lead attends selected site safety issue and assessment meetings, and reports to the CNS, keeping the Site Lead backup informed on any decisions or requests for action from the CNS.

The Site Lead backup supports the lead in their absence or as appropriate based on functional expertise.

Section 3 Processes

3.1 Startup and Restart of Nuclear Facilities

- a) CNS staff works with the HQ Program Offices to be on distribution for all periodically submitted field Startup Notification Reports (SNRs).
- b) CNS staff reviews all SNRs received in a timely manner, paying particular attention to proposed startup/restart activities associated with high hazard, high consequence DOE nuclear facilities.

- c) CNS staff provides feedback based on SNR reviews to HQ Program and associated Field elements as appropriate.
- d) CNS staff reviews specific Plans of Action and Implementation Plans for proposed Operational Readiness Reviews (ORRs) and Readiness Assessments (RAs) as requested from HQ Program and associated Field elements.
- e) Based on ORRs and RAs identified in the SNRs, CNS staff coordinates with the identified Authorization Authority to participate as a team member on selected reviews, paying particular attention to the reviews associated with high hazard, high consequence DOE nuclear facilities/activities.
- f) CNS staff coordinates with the ORR/RA team leader in the planning of the assessment relative to their assigned responsibilities.
- g) CNS staff participates in the review on-site, performing interviews, reviewing documents, and/or observing operations as necessary to complete their assigned area of responsibility. This includes documentation of findings, observations, and noteworthy practices in support of the team leader preparation of the review final report.
- h) For all findings and issues identified during the review, CNS staff is available to the facility/activity being assessed to clarify any issues raised during the assessment and, at the discretion of the team lead and based on availability, play a role in verification of corrective actions for their identified issues.
- i) CNS staff closes their review support by preparing a staff report for the CNS highlighting the summary, scope, and issues identified during the course of the assessment. An element of this report includes not only the assessment efforts, but a critical evaluation of the conduct of the assessment itself to capture lessons-learned for future assessments. This information will be fed back to the responsible Field and/or HQ program office.

3.2 Site Assessments

- a) Site Leads establish a working relationship with DOE field and headquarters program representatives responsible for nuclear safety-related activities at their responsible sites.
- b) Site Leads obtain site assessment and headquarters program oversight schedules.
- c) Based on evaluation of the site assessment and headquarters program oversight assessment schedules, the Site Lead selects upcoming assessments on which CNS staff should participate. This decision will be based on the applicability of the assessment to nuclear safety for high hazard, high consequence DOE nuclear facilities, and past performance issues affecting nuclear safety. Participation may be as an observer or assessment team member.
- d) The Site Lead communicates with the assessment team leader and determines where and how CNS staff participation will have the most impact and support to the team.

- e) The CNS staff coordinates with the assessment team in the planning of the assessment relative to their assigned responsibilities.
- f) The CNS staff participates in the assessment on-site, performing interviews, reviewing documents, and/or observing operations as necessary to complete their assigned area of responsibility. This includes documentation of findings, observations, and noteworthy practices in support of the team leader in preparation of the final assessment report. The HQ or field organization conducting the assessment is responsible for documenting and managing all findings and issues through resolution.
- g) For all findings and issues identified during the assessment, CNS staff will be available to the facility/activity being assessed to clarify any issues raised during the assessment and, at the discretion of the team leader and based on availability, play a role in verification of corrective actions for their identified issues.
- h) The Site Lead prepares a staff report for the CNS highlighting the summary, scope, and issues identified during the course of the assessment. Where a significant nuclear safety issue was not captured in the assessment report, that issue will be described for CNS action. This report will include discussion of not only the assessment efforts, but also a critical evaluation of the conduct of the assessment itself to capture lessons-learned for future assessments. This information will be fed back to the responsible Field and/or HQ program office.

Section 4 Records

Documents such as site assessment plans, startup notification reports, and operational readiness review and site assessment final reports for which CNS staff participates may be retained for 2 years from the completion of the CNS report. CNS staff reports are retained as records.