



U.S. DEPARTMENT OF
ENERGY



Department of Energy – Savannah River (DOE-SR) Assessment Program Overview

Planning, Assessment, and Issues Management

Dr. Brent J. Gutierrez
Director, Performance Assurance Division

CAB Meeting
26-27 September 2022

PRESENTATION CONTENT

- **Assessment Planning**
 - Drivers/Governing Documents
 - *Frequency*
 - Documentation of Assessment Plans
- **Conducting Assessments**
 - Drivers/Governing Documents
 - Assessment Types
 - Documenting Assessment Reports
- **Issues Management**
 - Transmittal of DOE identified Issues to the contractor
 - *Types of Issues and associated documentation*
 - DOE involvement in Issue resolution
- **Summary**

ASSESSMENT PLANNING

- **Primary Drivers**
 - DOE Order 226.1B
 - *Implementation of Department of Energy Oversight Policy*
 - DOE Order 414.1D
 - *Quality Assurance*
 - The conditions/requirements of the awarded contracts with the respective company
- **Additional Drivers**
 - DOE Order 426.1A
 - *Federal Technical Capability Program*
 - DOE Order 426.2
 - *Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities*
 - DOE Order 433.1B
 - *Maintenance Management Program for DOE Nuclear Facilities*
 - DOE Guide 226.1-2A
 - *Federal Line Management Oversight of Department of Energy Nuclear Facilities*

TYPES OF ASSURANCE PLANS

- The Annual Performance Assurance Plan (APAP) *is a fiscal year (FY) plan*, based upon the TPAP that schedules oversight assessments of contractors, independent assessments of DOE-SR performance, and DOE-SR wide self-assessments for operational awareness activities.
- An Annual Assessment Plan (AAP) *a fiscal year plan* at the Assistant Manager/Office Director (AM/OD) level of oversight activities. It contains assessment requirements specific to each organization and are developed by incorporating the applicable APAP sections for each organization.

ANNUAL PERFORMANCE ASSURANCE PLAN (APAP) - DETAILS

- The Annual Performance Assurance Plan (APAP) is the **DOE-SR office level schedule** of oversight activities for the fiscal year.
- The Office of Safety & Quality Assurance (OSQA) will ask the Assistant Managers and Office Directors (AM/OD) for Assessment Topics to be included in the APAP.
- The AM/OD feedback, changes, and comments will be evaluated to determine focus areas for incorporation into the APAP.
- OSQA will finalize the APAP, **obtain organizational review/concurrence**, and submit it for DOE-SR Site Manager approval.
- The **Site Manager will review and either accept or reject the APAP.**
 - If rejected, OSQA will reevaluate the feedback and finalize a new draft to be presented to the MGR.
 - Once approved, OSQA will distribute to all AMs/ODs.

ANNUAL ASSESSMENT PLAN (AAP) - DETAILS

- An Annual Assessment Plan (AAP) is the **AM/OD level organizational schedule** of oversight activities for the fiscal year.
- It includes all applicable items from the APAP, organization specific requirements, and management directed items.
 - DOE-SR's oversight processes **evaluate ourselves and contractor** operations, activities, programs, management systems, and site assurance systems for performance assurance including compliance with requirements.
 - *Based on the results of operational awareness activities; assessments of facilities, operations, and programs; and assessments of the contractors' assurance systems.*
 - **A Graded Approach** is applied to determine the level and/or mix, (i.e., rigor or frequency in a particular area) of oversight and may be tailored based on consideration of hazards and the operational performance of the contractor's programs and management systems.
- Once approved by the AM/OD, the AAP will be entered into the site issues management system [Site Tracking, Analysis, & Reporting (STAR)] with commitment dates.
- **AAPs can be changed** throughout the year to adjust for mission requirements, with the approval of the AM/OD.

CONDUCTING ASSESSMENTS OF THE CONTRACTORS

- DOE-SR Subject Matter Experts (SMEs) **conduct all assessments** in accordance with the requirements of **Savannah River Manual (SRM) 226.1.1I** (current Revision)
- Assessments are **performed using Lines on Inquiry (LOIs)** designed to fully evaluate a Program's or Facility's compliance with established requirements
 - The number and specificity of LOIs is determined by the assessor(s)
 - Results from LOIs
 - *Are documented in a manner sufficient that a knowledgeable person would be able to recreate the assessment and have a good chance at arriving at the same conclusions as the assessor(s)*
 - *Document the results of document reviews, personnel interviews, and work observations*

CONDUCTING ASSESSMENTS OF THE CONTRACTORS (continued)

- Results of LOIs also document:
 - **Noteworthy Practices (NP)**
 - *An activity that is performed in a manner warranting emulation, commendation, or application to other problems or facilities.*
 - **Issues**
 - **Finding**
 - An action, document or condition identified that deviates from minimum written requirements.
 - **Finding – Corrective Action Plan (CAP) required**
 - A finding that is considered by DOE-SR management to have a significant impact to the site, workers, the public, and/or the environment and therefore requires formal approval of the CAP and verification of closure of the Corrective Actions (CAs) to provide reasonable assurance that the underlying issue has been adequately resolved to prevent recurrence.
 - Corrective Action Plan
 - » *A formal document that provides the plan for correcting a finding or concern.*
 - » *A CAP must contain corrective actions, which when put together, resolve a problem to the degree required by the Contracting Officer/Contracting Officer's Representative (CO/COR) assessment transmittal letter.*

CONDUCTING ASSESSMENTS OF THE CONTRACTORS (continued)

- The results of LOIs will also document (continued):

- **Finding – DOE Concern**

- An egregious non-compliance, or a series of non-compliances indicating a programmatic failure.
- Formally transmitted to the contractors through a Contracting Officer/Contracting Officer's Representative (CO/COR) letter of concern and specifies any CAP requirements.
 - » For purposes of issue classification, these issues are of the highest importance and significance.

- **Finding – Completed on the Spot (COTS)**

- Identified findings that are corrected by the contractor within 24 hours of identification.
 - » Findings identified as COTS are included in the assessment write up.

- **Opportunity for Improvement (OFI)**

- An identified aspect of performance that is technically compliant but has the potential for quality, safety or productivity improvement.
 - » The contractor is not obliged to take action on these as the assessed Program Element, Sub-Element, and/or Operations Criteria is compliant with all applicable requirements.

COMPLETED ASSESSMENT REVIEW PROCESS

- Once assessor(s) have completed the assessment it is **submitted to the Functional Area Manager for their formal review/approval**
 - A Functional Area Manager (FAM) - A DOE-SR STAR management/supervisor function responsible for the review and approval/rejection of all submitted organizational assessments.
 - *If rejected the Assessment report is returned to the Assessor(s) for necessary changes.*
 - *If approved the Assessment report will move on to the next review.*
- Once the FAM has approved the report it will move on to the **Management Review Board (MRB)**
 - Team of assessors and pertinent managers assembled to review and discuss issues identified within assessments.
 - *Together this group approves findings, concerns, and the need for corrective action plans associated with issues identified within the reviewed assessments and may review status of open STAR issues.*

TRANSMITTAL OF COMPLETED AND APPROVED ASSESSMENT REPORTS

- When all reviews are done, and final approval of the STAR Assessment Report is completed the **report is ready for transmittal to the appropriate contractor**:
 - Assessment Reports containing Findings, OFIs, or NPs are transmitted to the appropriate contractor via the “Contractor Notification” function within the STAR system.
 - *The Contractor Notification function automatically distributes the report to a Distribution List set by a DOE STAR Program Issues Analyst or the Distribution List set by the Assessor(s) within the report itself.*
 - Assessment Reports containing Findings with CAP requirements or a Finding that is a DOE Concern can only be transmitted via a CO/COR letter.
 - *Due to the severity of these types of Issues the CO/COR letter will contain specific steps that the contractor must complete.*
 - Depending upon the issue the contractor may be given 45 to 60 calendar days to submit a formal response to the identified issues.
 - *The CAP is attached to the STAR assessment report; DOE formally reviews the CAP and approval is noted within the assessment report.*
 - If the DOE rejects the CAP, it is returned to the contractor for revision and a notification is sent to the appropriate corporate Vice President.

ISSUES MANAGEMENT – COMMITMENT TRACKING SYSTEM (CTS)

- The **contractor** receiving notification of Issues identified by the Department **will create a CTS Record** within STAR to initiate, monitor, and eventually close Corrective Actions to address the Issue(s) and Prevent Recurrence.
 - Findings with a CAP requirement
 - *The CAP must contain Corrective Actions (CAs) that when combined will fully address the identified Issue(s); further, at least one CA must be flagged within the CTS Record as “Prevent Recurrence”*
 - *Additionally, any Prevent Recurrence CA(s) identified within the CAP will also be flagged in the CTS Record as a “DOE Commitment”*
 - CAs with a DOE Commitment flag require a review by a Department SME with concurrence by the SME’s Supervisor before the Action can be closed by the contractor
 - **NOTE:** CAs flagged as DOE Commitments *do not also require the “Prevent Recurrence” flag* (any CA may be flagged by the contractor as a DOE Commitment)
 - STAR does not limit the number of CAs that can be associated with a given Issue
 - CAs will be assigned a Responsible Action Manager and an Assignee charged with executing each CA by the assigned due date
 - Extensions to the due date may be granted in accordance with Site-wide procedure; the Extension, its justification, and approval are documented within the CA
 - The CTS Record cannot be closed until *all* CAs are closed in accordance with procedural requirements

ISSUES MANAGEMENT – CTS (continued)

- The Action Assignee completes the assigned action and documents actions taken in CTS and references or attaches objective evidence of completion to the CTS:
 - Whenever possible and available, objective evidence of closure documentation should be attached to the CTS record.
 - If objective evidence is not attached, a clear description of the action taken is provided and/or reference is provided as to where the information may be located in the Closure Statement.
 - Examples of objective evidence (not an inclusive list):
 - *A copy of the CAP*
 - *Training/Training Courses created to address the Issue (course content)*
 - Attendance Roster for said Training
 - *Briefings and associated materials*
 - Attendance Roster for said Briefings
 - *Revised Procedure(s)*
 - *Technical Basis/Decision Paper(s)*
 - *Extent of Condition (if required)*
 - *Causal Analysis (Apparent or Root)*
 - *Correspondence (e.g., E-mails between contractor and the Department for concurrence purposes)*

RECENT CHANGES TO DOE MANAGEMENT OF EXTERNAL ASSESSMENTS

- DOE-SR recently received a Report from the **Office of the Inspector General (OIG) May 2022** regarding recommendations for improvement in the handling and disposition of External Assessments conducted across the DOE Complex including those on Savannah River Site.
- *OSQA prepared the response and Corrective Actions to resolve the Recommendations applicable to SRS*
- The following slides address each Recommendation and the DOE-SR response:

OIG RECOMMENDATION #2

“Ensure that EA-30 findings and deficiencies are properly documented and tracked in the issues management system, in accordance with Department Orders (O) 227.1A and 226.1B.”

- **Corrective Action**

- The IPAM is being updated to require DOE-SR to;

“In order to ensure that external assessment Findings are afforded the appropriate priority and resource allocation, issues identified through external assessment will be entered and documented within the existing framework of the STAR system (e.g., EA-30 Findings will be entered as Findings requiring a Corrective Action Plan (CAP), Deficiencies will be entered as Findings without a CAP, and Observations will be entered as Opportunities for Improvement or Noteworthy Practices as applicable).”

OIG RECOMMENDATION #3

“Ensure consistent oversight for the issue’s management process, including the development of CAPs for EA-30 findings.”

- **Corrective Action**

- This recommendation will be addressed with the completion of the corrective action for Recommendation #2 and with the completed corrective action for Recommendation #4.

OIG RECOMMENDATION #4

“Work with EA-30 site leads or team leads, as needed, to ensure that once the CAPs are developed, they are sufficient.”

- **Corrective Action**

- Section 9 of The IPAM was revised on **25 February 2021** to include specific language regarding the process that will be implemented by the DOE-SR External Assessment Liaison in order to coordinate the development and approval of CAPs for external organizations (to include EA-30).

NOTE:

CAPs for all external assessments are to be shared with the respective external assessment entities for review and/or comments, to determine if they are sufficient, prior to closure of the associated STAR assessment.

EA-31 ASSESSMENT of SPECIFIC ADMINISTRATIVE CONTROLS DWPF

- EA Assessment report dated **May 2022** documented in assessment record 2022-SA-003674, *EA Assessment: Independent Assessment of Specific Administrative Controls at the Savannah River Site Defense Waste Processing Facility (May 2022)*
 - Three **Deficiencies** documented as **Findings with CAP Required**
 - One **OFI** documented as an **OFI**

SUMMARY

- Savannah River Site (SRS) has an established, robust, Issues Management System in place to Identify, Document, Resolve, and Prevent Recurrence Issues of an Operational and/or Programmatic nature.
 - The system is utilized by all contractors and the Department to consistently identify, document, and resolve Issues in performance
 - The substantial procedural guidance ensures that all Site contractors approach Issues Management in the same manner
 - The extensive data collected by the system allows for detailed trend analysis
 - *These analyses can identify Issue precursors allowing contractors to take steps to implement action to prevent the Issue from occurring*
 - *Additionally, these analyses can provide trend information allowing for detailed results or Common Cause Analysis activities so the universal actions may be taken with Site-wide impact*
- The Department's oversight of Operational, Programmatic, and Contractor Assurance activities ensures that SRS contractors remain focused on those activities with the higher risk in order to mitigate and/or prevent significant Issues from occurring.

THANK YOU FOR YOUR TIME

Questions?