

**Independent Oversight Review
of the Facility Representative Program at the
Idaho Site**



March 2013

**Office of Safety and Emergency Management Evaluations
Office of Enforcement and Oversight
Office of Health, Safety and Security
U.S. Department of Energy**

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Acronyms

AMWTP	Advanced Mixed Waste Treatment Project
ATR	Advanced Test Reactor
BEA	Battelle Energy Alliance, LLC
CAS	Contractor Assurance System
CRAD	Criteria Review and Approach Document
CWI	CH2M-WG Idaho
DOE	U.S. Department of Energy
DOE-ID	DOE Idaho Operations Office
DOMS	Deviations of Minor Significance
DPO	Differing Professional Opinion
EM	Office of Environmental Management
ESH&QA	Environment, Safety, Health, and Quality Assurance
FR	Facility Representative
FTE	Full Time Equivalent
FY	Fiscal Year
HRP	Human Reliability Program
HSS	Office of Health, Safety and Security
ICP	Idaho Cleanup Project
INL	Idaho National Laboratory
MFC	Materials and Fuels Complex
NE	Office of Nuclear Energy
NSP	Nuclear Safety and Performance
OFI	Opportunity for Improvement
OPAD	Operational Performance Assurance Division
OPM	Office of Personnel Management
ORPS	Occurrence Reporting and Processing System
OSB	Operational Safety Board
REC	Research and Education Campus
RWMC	Radioactive Waste Management Complex
SME	Subject Matter Expert
SWC	Site Wide Complex
TSR	Technical Safety Requirement

Independent Oversight Review of the Facility Representative Program at the Idaho Site

1.0 PURPOSE

The U.S. Department of Energy (DOE) Office of Enforcement and Oversight (Independent Oversight) within the Office of Health, Safety and Security (HSS), performed an independent review of the Facility Representative (FR) program at the Idaho Site. The review was performed by the HSS Office of Safety and Emergency Management Evaluations by shadowing a DOE Idaho Operations Office (DOE-ID) assessment team during its periodic self-assessment of the program. The purpose of this Independent Oversight review effort was to evaluate the FR program and FR self-assessment methodology implemented at the Idaho Site.

This review was performed at the Idaho Site from November 13 to 16, 2012. This report discusses the scope, background, results, conclusions, and opportunities for improvement (OFIs) resulting from this review, as well as any items needing further follow-up by HSS.

2.0 SCOPE

The Idaho Site is comprised of the Idaho National Laboratory (INL), the Idaho Cleanup Project (ICP), and the Advanced Mixed Waste Treatment Project (AMWTP). DOE-ID provides direction and oversight for the design and operation of the Idaho Site nuclear facilities for the DOE Headquarters Offices of Nuclear Energy (NE) and Environmental Management (EM), with NE responsible for INL facilities and EM responsible for ICP and AMWTP facilities. Within DOE-ID, the two line management organizations exercise responsibility for oversight of these nuclear facilities and their activities. Under the Deputy Manager for Operations Support, the Operational Performance Assurance Division (OPAD) Director is responsible for contractor oversight of the NE facilities. Under the Deputy Manager for ICP, oversight of the EM facilities is the responsibility of the Assistant Manager for Nuclear Safety and Performance (NSP).

The primary contractors responsible for the management and operation of the INL, ICP, and AMWTP facilities are Battelle Energy Alliance, LLC (BEA), CH2M-WG Idaho, LLC (CWI), and Idaho Treatment Group, LLC (ITG), respectively. Most of the Idaho Site nuclear facilities, which are categorized as hazard category 1, 2, or 3, pursuant to DOE-STD-1027-92, *Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports*, are located at the Advanced Test Reactor (ATR) Complex, the Materials and Fuels Complex (MFC), the Idaho Nuclear Technology and Engineering Center (INTEC), and the Radioactive Waste Management Complex (RWMC).

For this review, Independent Oversight shadowed the DOE-ID self-assessment of its FR program. By shadowing this review, Independent Oversight was able to evaluate the FR program self-assessment process implemented by DOE-ID in accordance with DOE-STD-1063-2011, *Facility Representatives*, as well as the program itself, and offer observed OFIs.

3.0 BACKGROUND

As prescribed by DOE-STD-1063-2011, site offices are to assess their FR programs periodically, with that periodicity not to exceed three years. The last FR program self-assessment conducted by DOE-ID

took place in February 2010. Since that time, and over the past several years, DOE-ID has been recognized for the performance of its FR staff. Over the last 10 years, the DOE-ID FR program has produced five recipients of the "Facility Representative of the Year Award." This award is competed for across the DOE complex, and all nominated candidates are evaluated by the Chief Health, Safety and Security Officer, and program office managers. The awarded FR is to have exhibited "superior or exemplary service" over that year; therefore, having produced five recipients in 10 years, there is clear evidence of some programmatic strength. HSS determined that an independent assessment of the DOE-ID FR program would be productive in identifying the source of its successes and the potential for further improvement. In addition, HSS seeks to determine how DOE-ID and other DOE site operations offices can enhance and maintain successful and high-performing FR programs.

Independent Oversight chose to shadow this review as part of an ongoing effort to coordinate HSS independent review activities with planned and scheduled site activities that make use of similar resources. Shadowing, for this effort, is defined as Independent Oversight coordinating with the DOE-ID assessment team to concurrently observe work evolutions and sit in on interviews as the DOE-ID Facility Representative Program Self-Assessment Plan was executed. By so doing, Independent Oversight was able to evaluate DOE-ID's self-assessment planning process, as well as its execution of the self-assessment plan. In addition, by shadowing the use of the DOE-ID criteria, review and approach document (CRAD) for this activity, Independent Oversight was able to independently assess aspects of DOE-ID FR program implementation.

4.0 RESULTS

The following sections discuss the observations made by Independent Oversight during this review. As discussed above, Independent Oversight reviewed the self-assessment plan, the execution of that plan, and the implementation of the FR program at the Idaho Site.

FR Program Self-Assessment Planning

DOE-ID developed a Facility Representative Program Self-Assessment Plan, which was approved by the OPAD Director. The Plan contains objectives, purpose, scope, and schedule; CRADs; assessment approach; and assessment report format. All team members who participated had numerous years of experience, and several were current or former FRs at DOE-ID.

Independent Oversight found that the self-assessment objectives were consistent with the lines of inquiry contained in DOE-STD-1063-2011 that the team was adequately staffed and members were appropriately experienced. One observation noted by both Independent Oversight and the assessment team leader was that no representatives from other DOE sites participated in this assessment. Including members from other sites would strengthen the independence of the group and provide an excellent opportunity to obtain a different viewpoint and exchange information. (See OFI-1)

FR Program Self-Assessment Execution

FR Program Support

The DOE-ID assessment team examined the following CRAD objectives related to FR program support:

- Objective FR-1: The Facility Representative training and qualification program that is in place results in well-trained, qualified Facility Representatives.
- Objective FR-4: Management provides adequate functional support for Facility Representatives.

- Objective FR-5: An adequate performance assessment and feedback program is in place to assess the effective implementation of the Facility Representative Program.

The DOE-ID self-assessment team interviews that were observed by Independent Oversight regarding the FR program support related CRAD objectives were adequately conducted and included the necessary interviewees (several FRs, FR work leads, and the DOE-ID technical qualification program manager). The assessor for CRAD objective FR-1 reviewed digital training records, such as initial qualification exams, requalification exams, cross qualification exams, qualification letters, training program entry letters, oral board questions, and facility walkthrough questions.

For objective FR-4, interviews were conducted with FR staff, the Radiological Controls subject matter expert (SME), and several supervisors and managers. The series of questions dealt with FR staff attrition, career enhancement, and incentives. The DOE-ID assessor acknowledged that implementing an exit interview process would help the organization to better understand FR staff attrition. Independent Oversight agrees that an exit interview process would benefit the program. (See OFI-5)

The DOE-ID assessor for objective FR-4 verified the existence of a DOE-ID Differing Professional Opinion (DPO) process by reviewing operating procedure 01.OP.05, Revision 3, *Differing Professional Opinion*. Independent Oversight noted, and the DOE-ID assessor acknowledged, that a more robust line of inquiry regarding the effectiveness of the DPO process would have made the assessment more effective.

The DOE-ID assessment team interviewed the OPAD Director, who manages DOE-ID FR staff, and pursued lines of inquiry regarding performance indicators, the FR Corporate Board, staffing levels, the value of FR oversight input, and how management expectations for the FR program are conveyed to the FR staff. Retention of FR staff was also discussed.

During the outbrief, the DOE-ID assessment team concluded that for CRAD objective FR-1, the training program was "solid," but acknowledged that there were some issues with out-of-date documents, including the qualifying officials list. For CRAD objective FR-4, the DOE-ID assessment team identified an observation related to the effectiveness of the incentive program being diminished by the recent reduction in the number of available GS-14 work lead positions. The DOE-ID assessment team report identified a number of observations pursuant to objectives FR-1, FR-4, and FR-5. For example, the report discusses the need to update the Qualifying Officials List, the concern with FR staff attrition, and the need for appropriate closeout of previous assessment issues.

For the activities observed pursuant to CRAD objectives FR-1, FR-4, and FR-5, Independent Oversight observed that the DOE-ID assessment team has used sound judgment and an effective methodology to draw its conclusions. However, Independent Oversight also observed that the DPO process was not discussed in such a way that invoked detailed questions or comments during interviews, and the assessor acknowledged that additional review may be needed in this area. The plan did not provide sufficient provisions to ensure FR staff were interviewed to assess their knowledge of and familiarity with the DPO process, and did not include a robust line of inquiry regarding implementation of the DPO process. (See OFI-2)

FR Performance of Duties

The assessment examined the following CRAD objectives related to FR performance of duties:

- Objective FR-2: The Facility Representative Program provides adequate coverage for DOE facilities.
- Objective FR-3: Facility Representatives provide effective oversight of facilities.

Activities for assessing FR-2 and FR-3 included interviewing personnel, observing the FR staff during evolutions, and reviewing documentation. To gather data for these CRAD objectives, the DOE-ID assessors developed a questionnaire that was distributed to all FR staff, requesting anonymous responses. This method expedited the process of collecting data and provided an opportunity to observe any convergence between the questionnaire responses, observations, and interviews. Interviews were conducted with a cross-section of FR staff representing the EM and NE groups, work leads, FR supervisors, and senior DOE and contractor management. In addition, the assessors responsible for CRAD objectives FR-2 and FR-3 conducted interviews with the OPAD Director and NSP Assistant Manager, who supervise the FR staff covering INL and ICP (including AMWTP) facilities, respectively. Lines of inquiry focused on event notification, staffing analysis, FR vacancies, FR coverage during absences, Occurrence Reporting and Processing System (ORPS) reporting, contractor corrective action effectiveness, FR staff face-time with management in the field, stop work authority, FR time in the field for operational awareness, and the effectiveness of FR staff.

The DOE-ID assessment team members observed FR staff during evolutions that included the conduct of an Operational Safety Board (OSB) for the startup of the ATR, and an emergency management training drill at the AMWTP. ORPS reports (used to determine the timeliness of FR reviews) and operational awareness assessment reports, were among documentation that was reviewed.

The first evolution observed by the DOE-ID assessor was the ATR startup OSB. The ATR FR attended the OSB, which included representatives from most of the ATR contractor organizations, including operations; independent safety; maintenance; engineering; nuclear safety; environment, safety, health, and quality assurance (ESH&QA); technical safety requirements (TSRs) and surveillance; and documents management. The second evolution observed involved an emergency management training drill at the AMWTP, involving a tabletop exercise for a dropped drum scenario. The DOE-ID assessment team members observed the FR during the conduct of the drill. After each observed work evolution, the responsible assessors followed up with the FRs concerning the evolution just observed and then proceeded with the CRAD lines of inquiry. In the case of both work evolutions, the DOE-ID assessor was thorough in pursuing his planned lines of inquiry and exhibited an appropriate questioning attitude.

DOE-ID assessment team interviews with the FR staff, including those with the FR work leads, also addressed communications with the contractor and DOE management, stop work authority, interactions with the contractor, staffing, field presence, work priorities, Contractor Assurance System (CAS) reviews, other assignments, strengths of the FR program, and recommendations for improvement.

During the outbrief, the DOE-ID assessment team concluded that, for CRAD objective FR-2, the objective was met; however, there was an observation about the length of vacancies in the FR work lead positions at ATR and RWMC, which results in additional administrative burdens on the remaining FR staff. The DOE-ID assessment team identified a weakness related to CRAD objective FR-3 in regard to the timeliness of FR staff reviews of ORPS reports (this was a repeat from the previous self-assessment). The DOE-ID assessment team reported on three additional observations related to inconsistent documentation of deviations of minor significance (DOMS), inconsistent descriptions of stop work authority, and inconsistent evaluations of the CAS.

For the activities observed pursuant to CRAD objectives FR-2 and FR-3, Independent Oversight observed that the DOE-ID assessment team used sound judgment and an effective methodology to determine its findings and observations.

FR Program Implementation

Through shadowing the DOE-ID assessment, Independent Oversight also made independent observations

regarding DOE-ID FR program implementation. By observing interviews and work evolutions concurrently with the DOE-ID assessment team as they pursued its lines of inquiry, Independent Oversight was able to glean valuable insights about how the DOE-ID FR program is supported and how the FR staff perform their duties.

FR Program Support

In general, the FR staff who were interviewed indicated that they were given adequate time and resources to achieve the necessary qualifications. Independent Oversight observed that all qualification training records were found to be kept satisfactorily. However, the FR staff identified some issues with the qualifying official list, which was described as confusing and in need of an update.

Independent Oversight noted that DOE-ID management offers various incentives to the FR staff in an effort to provide functional support to those filling the FR position. Some of the incentives for FR staff include support for professional development through funding for certifications and advanced degrees, flexible workplace accommodations (“flexi-place”), a “dream assignment” list (in which FR staff state their preferences for facility assignments), rotations every five years, and liberally allowing lateral assignments. Independent Oversight also observed that DOE-ID uses such activities as project management, Integrated Safety Management System teams, and accident investigations as opportunities for FR staff development. However, attrition was identified as a concern, and the FR staff who were interviewed identified multiple factors believed to contribute to this concern; e.g., the reduction of work lead positions, the removal of hiring authority from the operations office, and the cancellation of annual retention bonuses for FR staff. Independent Oversight noted that the DOE-ID FR program does not conduct exit interviews with departing FR personnel. An exit interview process would be a useful enhancement to help DOE-ID to better understand causes of the current level of attrition and would benefit the program in the long term. (See OFI-5)

Interviews with both FR staff and line managers indicated that there was good support for the FR staff and for resolving the issues that they identify. FR access to senior management includes weekly teleconferences, monthly reports, and quarterly training sessions. However, Independent Oversight noted that the FR staff do not have routine, face-to-face meetings with the Operations Office Manager. Additionally, one supervisor indicated a need for better communication between FR staff and Federal project management, and one FR indicated that issues raised by the FR staff were more likely to be challenged by the contractor when the project was behind schedule. (See OFI-4)

An interview with the Radiological Controls SME indicated that an effective relationship exists between the SME staff and FR staff. The interview also revealed that information is shared across the DOE-ID organization. During a work evolution (a walkdown of the seismic upgrade to the MFC Analytical Laboratory (MFC-752)), Independent Oversight observed the interaction between the Hoisting and Rigging SME and an FR. The FR demonstrated familiarity with the work and the work history, and the cooperative relationship between the two helped result in the SME identifying an electrical deficiency.

Independent Oversight observed that DOE-ID management has implemented a DPO process, which serves as one way that management provides functional support to the FR staff. Discussions among the DOE-ID assessment team members showed that they were familiar with the process, but some indicated that it had not always been used successfully. This is an indication, however anecdotal, that management should verify that the DPO process is fully supported and effective. (See OFI-2)

In an interview with the OPAD Director, Independent Oversight learned that an FR Corporate Board, made up of FR staff and leadership, exists to help establish policy with regard to how the FR program is implemented and administered. For example, the FR Corporate Board concurred on the staffing plan, in

accordance with the DOE-ID program description, 03.OD.03, *Facility Representative Program*. The Director indicated that the FR Corporate Board has not addressed FR attrition, but has reviewed the FR staffing analysis and plans, temporary details, and assignments.

In addressing performance assessment and feedback, the OPAD Director stated that, among other metrics, the FR performance appraisals include a performance measure on the timeliness of FR assessments. His expectations for the FR staff are typically conveyed to the FR team leads, who then pass them along to the FR staff. He also noted a recent change in which the FR staff members covering EM facilities report to the NSP Assistant Manager; however, the FR staff groups and their respective supervision do coordinate to ensure consistency across organizations.

Regarding efforts to retain FR staff and afford them options for career mobility, the OPAD Director acknowledged a concern about the lack of upward mobility (i.e., the number of work lead positions has been reduced and the DOE-ID FR position is limited to a GS-13 full performance level), as well as a recent review of the FR position grades as performed by the Office of the Chief Human Capital Officer that indicated the appropriateness of the current FR pay grade limitations. The Director expressed concerns that qualified FR staff had already left DOE-ID to obtain more lucrative positions, that the FR staff at DOE-ID are already graded at a lower level than many other sites, and that the current efforts to reclassify the FR staff to even lower schedules (i.e., lower than GS-13) would result in even more highly trained, experienced, and qualified FRs leaving the program. The strength of the FR program at the Idaho Site, which is vital to the conduct of Federal oversight of safety, hinges upon the ability to hire and retain highly-skilled and experienced staff. Although DOE-ID has so far been able to compensate for retention challenges, limiting the career paths of FR staff members could eventually erode the effectiveness of nuclear safety oversight in the long-term. (See OFI-6)

Independent Oversight observed that the DOE-ID FR staffing level has remained at around 80 percent of the authorized level. The OPAD Director indicated that some positions were kept open in order to manage fluctuations in workload and to ensure that a staff position remains available in case the workload decreased and personnel had to be reassigned. Independent Oversight noted that the fiscal year (FY) 2013 staffing analysis contained inconsistencies between the summary table and the supporting descriptive text. The table shows that 4 full time equivalents (FTEs) are needed for MFC FR coverage and 4 FTEs are needed for the INL Research and Education Campus (REC) and Site Wide Complex (SWC); however, the text states that 5 FTEs are needed for MFC and 3 FTEs are needed for REC and SWC. This observation was passed along to the DOE-ID assessment team for further analysis. Nevertheless, the FY 2013 staffing analysis, which shows that 14 FRs are assigned, is consistent with the November 2012 organization chart, after factoring in the recently hired work lead.

FR Performance of Duties

Independent Oversight shadowed the DOE-ID assessment team in their effort to complete its CRAD objectives related to the performance of FR duties. One of the primary mechanisms the DOE-ID FR program utilizes to maintain operational continuity is a routine operations call that is held on Mondays and involves FR staff, their management, SME staff, and safety system oversight staff. This call is used to provide status updates on operational and production issues in the Idaho Site facilities. In addition, the FR staff documents the status of their facilities in a weekly evaluation report in accordance with DOE-ID work instruction 03.WI.04.02, *Conduct of Oversight Activities*, which is provided to participants prior to the operations call.

Short-term facility coverage and coordination among the FR staff assigned to a given project is the responsibility of the FR work leads, who assign work so as to coordinate oversight among the FR staff, attend the plan of the day meetings, and review upcoming work. Work leads are also responsible for

reviewing FR products (including the documentation and communication of issues) and managing CAS oversight (selecting contractor assessments for review, assigning to FRs, and consolidating monthly reviews). According to those interviewed, a reduction in available FR work lead positions has resulted in less opportunity for promotion. Several of the FR staff also addressed concerns with the staffing level. Discussions on filling vacancies in FR staff positions touched on the fact that delays in hiring (described as a result of losing local hiring authority), added to the time needed to adequately train and qualify new employees, and this can mean that vacancies remain unfilled for an extended period. Some FRs stated that they had to pick up additional administrative duties when FR work lead positions are not filled. Although the FR staff indicated that they are able to accomplish their duties, many expressed a concern that they were stretched thin. Nevertheless, management indicated that two new FRs were slated to begin as of November 18, 2012.

The DOE-ID FR staff is responsible for conducting monthly CAS reviews. Some FR staff indicated that such additional duties can detract from field time. One FR indicated that many of the FR staff struggle to properly perform the monthly CAS reviews and that they use various inconsistent methods to do so. When asked about the value of FR input on the CAS and the performance evaluation management plan, the OPAD Director indicated that the new oversight model produces a better product than three years ago, and he is working with the contractor to review the CAS metric elements, rather than relying on the operations office and FR staff to perform these reviews.

Independent Oversight observed that the FR staff at DOE-ID have the dual responsibility to conduct both activity-level field oversight of contractor operations and assessments of the contractor's CAS oversight program. Because both of these functions can be unpredictable and require significant attention and rigor, establishing a formalized and/or standardized process would help to ensure efficient time management and effective execution of both oversight responsibilities.

A review of the ORPS reporting system indicated that the FR staff covering EM facilities appear to be closing ORPS reports on time more consistently than those covering NE facilities. The NSP Assistant Manager, who supervises the EM FR staff, explained that the procedure used by the ICP contractor (CWI), MCP-190, *Event Investigation and Occurrence Reporting*, requires the contractor to notify DOE within 35 days and to provide the FR with a draft response; the INL contractor, BEA, does not follow a similar process.

With regard to stop work authority, which was covered by CRAD objective FR-3, DOE-ID uses two definitions for stop work: a "stop work action" provision, and a formal "stop work order." The "stop work action" exists primarily to allow an option that can avoid entering restart status (similar to a safety pause). All FR staff interviewed were knowledgeable of stop work authority and were recently trained on the revised definition of stop work, which includes both the "stop work action" and the "stop work order." The DOE-ID assessment team noted that, while the Conduct of Oversight Activities work instruction includes the revised definition for stop work authority, the FR program description only discusses stop work for imminent danger, serious damage to the facility, or environmental releases, and does not explicitly address the new "stop work action."

FR staff were fully engaged and rigorous in the conduct of field work and assessments when observed by Independent Oversight. When interviewed following an OSB at the ATR facility, the attending FR indicated that he was aware of all of the issues brought up at the OSB and considered the OSB adequate, although he stated that he would like to have heard more discussion of a particular issue. Contractor management in attendance at the OSB had the same opinion as the FR. For the emergency management training drill at the AMWTP facility, the attending FR was thoroughly engaged in the drill activities while being careful not to impede the contractor's training process. In addition, the FR demonstrated good familiarity with the emergency management process. He considered the drill to be satisfactory; however,

he noted a concern with the lack of strong communications and command and control exhibited by the emergency action manager and committed to follow up.

When interviewed, the FR staff indicated that they had ease of access to and adequate avenues for communication with the contractor and that they used informal communication for lower level issues but could elevate more serious issues as needed. Independent Oversight noted that some facilities require enrollment in the human reliability program (HRP) for unescorted access and that DOE-ID does not participate in the contractor's HRP. This results in the creation of an obstacle for FR staff to gain access to areas requiring HRP enrollment. Nevertheless, the FR staff members who were interviewed did not consider this to be a significant impediment to facility access. With respect to communication issues, most FR staff discussed the use of the DOMS process for low-level issues, as well as the use of "direct transmittal" for issues of greater significance, and identified the nature of their interactions with the contractor to be effective in resolving issues. The FR staff who were interviewed also indicated that they had adequate communication with DOE management, noting the weekly status meeting and the monthly operational awareness report. Contractor management who were interviewed expressed that communication with the FR staff was adequate. Contractor management also mentioned the use of informal communication, standing meetings, and the plan-of-the-day as methods of coordinating oversight activities with the FR staff. They considered issues to be communicated in a prompt and professional manner. None of the interviewees noted any difficulties in contacting the FR when needed. Issues identified were considered to be risk-informed, and at the right priority. They offered that the DOMS process has led to some improvement in this area. The FR interactions with the contractor staff were deemed appropriate, and the FRs are careful not to provide direction to the contractor. Based upon the observed work activities and interviews, the communication between the FR staff and contractor staff is healthy and appropriate for conducting effective oversight activities.

The DOE-ID Nuclear Materials Management Supervisor for MFC was also interviewed with respect to the FR program. He stated that FR staff had provided value to him in his current role as a program manager, and in his previous role as the Nuclear Safety Team Lead. FR staff identified issues of significance with operations and follows up on corrective actions. Numerous examples of communication were provided, including: walk-bys, phone calls, emails, Monday operational status meetings, Wednesday program meetings, and the monthly operational awareness reports. In his past role as the Nuclear Safety Team Lead, he included FR staff as team members for documented safety analysis (DSA) reviews, and they in turn provided potential safety basis issues to him. He had no recommendations for improving the FR program and considered FR staffing to be adequate. Independent Oversight observed that the FR staff is substantially relied on to aid in the assessment of varied and diverse aspects of nuclear safety throughout the Idaho Site.

The FR staff who were interviewed regarding the key elements of a strong program nearly unanimously identified hiring qualified people; spending significant time in the field; getting the appropriate amount of SME and management support; and exercising strong teamwork. When asked about areas for improvement, the FR staff mentioned the need to receive clear guidance from senior management about what is expected and noted that they are tasked with a lot of additional duties.

5.0 CONCLUSIONS

Based on the assessment activities that were shadowed, Independent Oversight concluded that DOE-ID planned and executed an effective periodic FR self-assessment at the Idaho Site. The assessment was planned in general accordance with the guidance and expectations of DOE-STD-1063-2011 and was executed with adequate rigor and thoroughness. A good cross-section of relevant staff were interviewed, attention was paid to activity-level observations to make performance-based assessments, and DOE-ID

assessment team members appropriately identified issues. Nevertheless, as discussed in Section 6.0 below, Independent Oversight identified opportunities to further enhance the effectiveness of periodic self-assessments. Securing outside expertise would help ensure that the DOE-ID assessment team has the benefit of added independence and external perspectives. Also, the assessment of the use of DPO and similar processes can be enhanced. (See OFI-1 and OFI-2)

In addition, based on a review of the documented FR oversight activities and observed FR actions, Independent Oversight concluded that the Idaho Site FR program has been implemented in accordance with DOE-STD-1063-2011 and is appropriately independent, effectively rigorous, and generally high-performing. The FR program consists of experienced and technically qualified staff members who exhibit a strong questioning attitude and use the available resources to efficiently carry out the oversight mission, as defined by DOE-ID management. Further, Independent Oversight observed that by providing rotations, allowing lateral transfers, encouraging professional development, and facilitating trainee qualification, DOE-ID management demonstrates support for the FR position and those who hold it. This demonstrated support has been the primary catalyst for the continued success of the DOE-ID FR program; and by seeking only experienced personnel, DOE-ID management recognizes the importance of the hiring process on the effectiveness of the FR program. However, as a result, long term programmatic success hinges on the ability to effectively maintain these hiring and performance standards. Therefore, Independent Oversight observed that aspects of knowledge transfer, hiring, and retention practices can be improved to ensure that staff attrition and personnel changes do not reduce the program's effectiveness. (See OFI-3, OFI-4, and OFI-5)

6.0 OPPORTUNITIES FOR IMPROVEMENT

During the review, Independent Oversight identified OFIs for both the DOE-ID FR self-assessment process and for the FR program. The DOE-ID oversight process identifies issues as concerns, findings, or observations. An observation represents a "situation that is presently in conformance with requirements but has the potential for future problems, deficiencies, failures, or adverse conditions, etc., based upon the assessor's judgment." A finding is a "failure to perform a specified action contrary to specific requirements" and can be based on requirements that "range from laws to contractor facility level procedures that if left unchecked could result in an adverse condition or outcome." Observations closely approximate OFIs, which, according to Independent Oversight protocols, 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." The OFIs from this Independent Oversight review are provided to DOE-ID for evaluation and follow-up in accordance with site procedures and processes.

FR Self-Assessment Process

- OFI-1: Consider working with Headquarters and other DOE sites to establish a working group of knowledgeable assessors from across the complex. This working group would provide a readily available pool of independent expertise that could staff FR program self-assessment teams with for scheduled periodic reviews as needed.
- OFI-2: Develop an enhanced assessment criterion and objective that focuses on appraisal of the effectiveness and desire to use the DPO and similar processes, which encourage diversity of opinion and propagate a healthy safety culture.

FR Program Implementation

- OFI-3: Develop, routinely update, and disseminate a “Best Practices Guide” to capture the most useful institutional knowledge and expertise of the FR staff and communicate this across the site.
- OFI-4: Consider implementing a periodic (e.g., quarterly or semi-annual) FR staff meeting with the Operations Office Manager.
- OFI-5: Implement an exit interview process for FR staff members who are retiring, resigning, or transferring.
- OFI-6: Review FR position descriptions to ensure that they are commensurate with the breadth of FR duties and responsibilities, and to verify that appropriate full performance grade levels are justified.

7.0 FOLLOW-UP ITEMS

None.

**Appendix A
Supplemental Information**

Dates of Review

Onsite Review: November 13-16, 2012

Office of Health, Safety and Security Management

Glenn S. Podonsky, Chief Health, Safety and Security Officer
William A. Eckroade, Principal Deputy Chief for Mission Support Operations
John S. Boulden III, Director, Office of Enforcement and Oversight
Thomas R. Staker, Deputy Director for Oversight
William E. Miller, Deputy Director, Office of Safety and Emergency Management Evaluations

Quality Review Board

William Eckroade
John Boulden
Thomas Staker
William Miller
Michael Kilpatrick
George Armstrong
Robert Nelson
Tom Davis

Independent Oversight Site Lead for the Idaho Site

Aleem Boatright

Independent Oversight Reviewers

Aleem Boatright - Lead
James Coaxum
Terry Olberding

Appendix B Documents Reviewed and Interviews

Documents Reviewed

- 03.OD.03, Facility Representative Program, R0, 6/13/11
- 03.OP.02, ID Event Notification and Reporting, R7, 3/18/11
- 03.PD.04, Contract Oversight, R10, 6/9/2012
- 03.WI.04.01, Oversight Planning and Scheduling, R4, 7/19/12
- 03.WI.04.02, Conduct of Oversight Activities, R9, 8/20/2012
- ATR Facility Modifications for Cycle 152B-1 that started on 10/24/2012, Rev 11/15/12
- ATR Startup OSB Agenda, Cycle 152B-1, 11/14/12
- DOE-STD-1063-2011, Change 1, Facility Representatives, 3/12
- FR assessment questionnaire
- Idaho Operations Office Organization Chart, 11/2012
- Memo to Provencher from Newbry, Subject: Department of Energy, Idaho Operations Office 2013 Facility Representative Staffing Analysis (OS-OPAD-FRP-12-019), date 10/23/12
- REP-EM-4/25/2011-2081, Operational Awareness Report, 4/25/11
- REP-EM-7/25/2011-11833, Operational Awareness Report, 7/25/11
- REP-EM-9/9/2011-67634, Surveillance Report, 9/9/11
- REP-ID-4/12/2012-11118, Operational Awareness Report, 4/12/12
- REP-ID-4/3/2012-73428, Assessment Report, 4/3/12
- REP-OS-10/1/2012-72929, Assessment Report, 10/1/12
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- REP-OS-5/29/2012-95588, Surveillance Report, 5/29/12
- REP-OS-5/3/2011-17644, Assessment Report, 5/3/11
- U.S. Department of Energy Idaho Operations Office Facility Representative Program Self-Assessment Plan, 11/12

Interviews Shadowed

- AMWTP Facility Manager
- ATR Operations Manager
- ATR Performance Assurance Manager
- DOE-ID Assistant Manager for Waste Disposition
- DOE-ID Operational Performance Assurance Division Director
- DOE-ID Assistant Manager for Nuclear and Safety Performance
- DOE-ID Facility Demo and Fuel Disposition Team Supervisor
- DOE-ID Facility Disposition Team Supervisor
- DOE-ID Facility Representative Supervisors
- DOE-ID Facility Representatives