

MANAGEMENT (MG)

OBJECTIVE

MG.1 – (Core Requirement 15) A feedback and improvement process has been established to identify, evaluate, and resolve deficiencies and recommendations made by oversight groups, official review teams, audit organizations, and the operating contractor. (Old Core Requirement 6)

Criteria

1. A corrective action tracking system and procedure for identifying, reviewing, cataloging, and resolving deficiencies and recommendations is adequately implemented. (DOE P 450.4; 10 CFR 830, Subpart A, Criterion 3; DOE O 5480.19, Ch. VI and VIII)
2. A feedback and improvement process to identify issues, deficiencies, and opportunities for improvement is implemented and effective. (DOE P 450.4)
3. Lessons learned issued by FWENC have been evaluated for applicability to SN process operations and have been appropriately implemented. (DOE P 450.4; 10 CFR 830, Subpart A)

Approach

Record Review: Review the FWENC issues management system, selecting representative issues and assessing the adequacy of corrective actions related to SN process operations. Review the implementation of the FWENC management assessment and independent assessment program to ensure that a feedback and improvement process is in place and effective. Review lessons learned issued by FWENC and evaluate their applicability and line management actions related to SN process operations. Assess the corrective action tracking system or issues management system backlog and prioritization system to ensure appropriate emphasis for startup of the SN process. Utilize results of the Contractor's ORR and the DOE-ORO MSA.

Interviews: Interview personnel responsible for corrective action and closure of issues to establish their qualification and understanding of the program. Interview various site personnel to see if the lessons learned program is actually in place through the use of some recent lessons learned sharing. Utilize results of the Contractor's ORR and the DOE-ORO MSA.

Observations: Walk down a closed corrective action(s) to ensure (1) documented actions were performed as tracked to closure through the issues management system and (2) the actions were effective in correcting the root causes of the identified deficiencies. Observe an issues management review session (or equivalent) and lessons learned discussions.

OBJECTIVE

MG.2 – (Core Requirement 17) The breadth, depth, and results of the responsible contractor ORR are adequate to verify the readiness of hardware, personnel, and management programs for safe operations. (Old Core Requirement 17)

Criteria

1. The scope and results of the contractor readiness determination are adequate for assessing the readiness of equipment, personnel, and management for safe operations. (DOE O 425.1)

2. There are no open pre-start findings, and all post-start findings have approved corrective action plans. (DOE O 425.1)

Approach

Record Review: Review the contractor ORR POA, Implementation Plan, and Final Report, including findings, recommendations, and corrective action schedules to ensure they are complete in scope and adequate in detail. Determine whether the contractor has systematically analyzed findings for root causes and generic implications. Check to see if corrective actions from the corporate ORR have been entered into the issues management or corrective action tracking system. Review closure plans for all ORR pre-start findings for completeness, and adequacy. Review open post-start finding corrective action plans for adequacy. Review FWENC readiness review team member qualifications to determine whether their level of knowledge of DOE readiness expectations is adequate.

Interviews: an adequate knowledge of the readiness process and results.

Observations: Verify, through a sampling of actions, that the contractor has adequately implemented actions for the closure of all pre-start findings and that the actions were effective in correcting the root causes of the identified deficiencies.

OBJECTIVE

MG.3 – (Core Requirement 14) Formal agreements between the operating contractor and DOE have been established via the contract or other enforceable mechanism to govern the safe operations of the facility. A systematic review of the facility's conformance to these requirements has been performed. These requirements have been implemented in the facility, or compensatory measures are in place and formally agreed to during the period of implementation. The compensatory measures and the implementation period are approved by DOE. (Old Core Requirement 7)

Criteria

1. A systematic review of compliance with DOE directives required in the contract Statement of Work has been performed. (DOE O 425.1; Contract Clause H-26)
2. Identified nonconformances to the requirements are identified and corrected. (DOE O 425.1; Contract Clause H-25)
3. Order requirements are flowed down to facility procedures and documents. (Contract Clauses H-25 and H-26)
4. A formal review/screening process has been established by ORO which ensures that new and revised DOE directives and other requirements are identified and systematically evaluated for inclusion in the FWENC contract. The results of the reviews have been documented. (DOE M 411.1-1B, Section 9.2.2.6; Contract Clause H-26)
5. An authorization agreement for SN process operations, including the authorization basis for the WPF, is in place. (DOE M 411.1-1B, Section 9.4.3.3; Contract Clause H-25)
6. Verify that requirements flowdown are assigned to subcontractors.

Approach

Record Review: Review the directives compliance matrix (ESH-6) to determine if it has been effectively implemented to support the operations phase of the contract. Review the contractor ORR evaluation of Order compliance and determine if the appropriate level of review was conducted. Review any findings (open programmatic nonconformances) associated with Order compliance, and verify the adequacy of the closure and corrective action plans. Review for completeness the directives requirements flowdown to facility

procedures and documents contained in the ISMS description document and the Quality Assurance Program Description (QAPD). Sample a number of the facility procedures and documents to trace and verify the requirements flowdown into the lower-tier documents. Review the formal screening process used by ORO for new or revised DOE directives to see if they are reviewed for possible incorporation into the FWENC contract. Sample the documented results of some of the ORO reviews to verify an adequate basis for decisions to not include directives requirements. Verify that an authorization agreement is in place and includes the necessary items to clearly authorize only the SN process portion of the WPF authorization basis. Review the ISMS description as the authorization agreement called out per the FWENC contract clause H-25. Check to see if the description document contains the essential elements of an authorization agreement called for by the DOE ISMS guidance documents. Utilize results of the Contractor's ORR and the DOE-ORO MSA.

Interviews: Interview personnel responsible for verification of the flowdown of contract requirements into the SN process implementing mechanisms and procedures. Interview ORO personnel responsible for the screening and review of new and revised DOE directives to determine their expertise and understanding of the requirements identification process. Utilize results of the Contractor's ORR and the DOE-ORO MSA.

Observations: None.

OBJECTIVE

MG.4 – (Core Requirement 2) Functions, assignments, responsibilities, and reporting relationships (including those between the line operating organization and ES&H support organizations) are clearly defined, understood, and effectively implemented, with line management responsibility for control of safety. (Old Core Requirement 11)

Criteria

1. Operations and support personnel fully understand their functions, assignments, responsibilities, and reporting relationships and can support line management control of safety. (DOE P 450.4; DOE O 5480.19, Chs. I and III, 10 CFR 830, Subpart A)
2. Responsibilities between Duratek Federal Services (Duratek) and FWENC for SN transfer and between UT-Battelle, LLC, and FWENC for emergency management have been established and are understood by all involved. (DOE O 5480.19, Ch. I and III, DOE O151.1)
3. Management monitors field activities for safe operations and promptly stops work when unsafe conditions arise. (DOE O 5480.19; Contract Clause H-25)

Approach

Record Review: Review the approved organization charts and associated documents defining the roles, responsibilities, and reporting relationships of the managers and personnel to determine if there are clear lines of authority and responsibility for control of safety for the SN process. Review documents defining the responsibilities between Duratek and FWENC for SN transfer and between UT-Battelle, LLC, and FWENC for emergency management to ensure that roles have been clearly established and are understood by the parties involved. Discuss with the other ORR team members any deficiencies they have noted in their functional area reviews regarding qualification, stop

work authority, and/or reporting relationships to ensure that the review results are consistent. Utilize results of the Contractor's ORR and the DOEORO MSA.

Interviews: Coordinate with the Operations Subteam and interview a sample of senior contractor managers and technical support personnel for SN process operations to ensure they understand their roles and responsibilities for the control of safety and have sufficient level of knowledge of the safety basis documents, TSR, and procedures. Interview selected operations personnel to verify they are familiar with and executing the responsibilities of their positions. Assess the operations interfaces with ES&H representatives to ensure these interfaces are clearly defined and understood in regard to safe and compliant operations. Utilize results of the Contractor's ORR and the DOE-ORO MSA.

Observations: Observe the implementation of roles and responsibilities between FWENC and Duratek during an SN transfer operation. Observe the implementation of roles and responsibilities between FWENC and UT-Battelle, LLC, during an emergency management drill. Observe how FWENC line management communicates and has implemented control of safety. Observe a "Corporate Safety Committee" meeting and follow up on deficiency resolution. Determine the function of the "Project Safety Committee" meeting and its frequency and purpose. Determine the function of the "Joint Committee" meeting and its frequency and purpose.