# **MAINTENANCE (MN)**

## **OBJECTIVE**

**MN.1:** The Site Office has oversight processes and procedures in place and has ensured that an effective and fully compliant maintenance safety management program (SMP) has been implemented at the site.

## **CRITERIA**

- 1. The Site Office has established procedures and mechanisms for overseeing the nuclear facility maintenance program including surveillances of ongoing nuclear facility maintenance activities and the oversight and assessment requirements specified in DOE O 433.1B (DOE O 226.1A; NA-1 SD 226.1A, DOE O 433.1B).
- 2. For each nuclear facility, the Site Contractor has prepared and submitted a nuclear maintenance management program (NMMP) that has been approved by the Site Office Manager. The NMMP is current and consistent with the commitments in the applicable documented safety analysis (DSA) (DOE O 433.1B; NA-1 SD 411.1-1C)
- 3. Site Office procedures and mechanisms ensure that contractor implementing mechanisms for the maintenance program meet contractual requirements as well as the maintenance commitments in each nuclear facility documented safety analysis (DSA) and Technical Safety Requirement (TSR). The implementing mechanisms are consistent with the guidance in DOE O 433.1B and associated guide, DOE G 433.1-1 (10 CFR Part 830; DSA and TSRs; DOE O 433.1B).
- 4. Site Office procedures and mechanisms ensure that contractor self-assessments and operational awareness activities include evaluating the effectiveness of the maintenance program and conducting periodic assessments to verify proper implementation of specific nuclear facility TSR maintenance requirements (10 CFR Part 830, DSA and TSRs; DOE O 226.1A; NA-1 SD 226.1A; DOE O 433.1B).
- 5. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-assessments) have been appropriately resolved, corrective actions have been completed and are adequate, or a clear path to completion is indicated (DOE O 226.1A; NA-1 SD 226.1A).
- 6. The Site Office has sufficient staff, and assigned personnel have adequate technical competence, to oversee the performance of the contractor in this functional area (NA-1 SD 411.1-1C).

## APPROACH

#### References:

- 10 CFR Part 830, Nuclear Safety Management
- DOE O 226.1A, Implementation of Department of Energy Oversight Policy
- DOE O 433.1B, Maintenance Management Program for DOE Nuclear Facilities
- DOE G 433.1-1, Nuclear Facility Maintenance Management Program Guide for Use with DOE O 433.1
- NA-1 SD 411.1-1C, NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM)
- NA-1 SD 226.1A, NNSA Line Oversight and Contractor Assurance System Supplemental Directive

# Record Review:

- Review the site contract List A/B, approved NMMP and DSAs and TSRs for selected nuclear facilities.
- Review Site Office assessments of, and operational awareness information on, the contractor maintenance program and Site Office procedures and organization for NMMP approval and oversight.
- Review maintenance training and qualification requirements and records of completion for Site Office personnel.
- Review the Site Office annual oversight plan and completed oversight for the routine assessment of activity-level work planning and control that also include critical review of integrated safety management core functions and their application.

# Interviews:

- Interview Site Office nuclear facility representatives and professional staff responsible for NMMP approval and oversight of the contractor's maintenance program.
- Interview Site Office nuclear facility representatives and professional staff responsible for NMMP oversight to determine whether Site Office oversight plans and the Contractor Assurance System has adequately institutionalized the NNSA Guidance for Activity Level Work Planning and Control Processes for Effective Incorporation of Integrated Safety Management and Quality Assurance, January 2006.

# Observations:

- If possible, observe Site Office personnel (other than facility representatives) engaged in oversight of the contractor maintenance program.
- Observe facility representative oversight of the contractor's maintenance program.