



**OFFICE OF SAFETY AND
EMERGENCY MANAGEMENT
EVALUATIONS PROTOCOL FOR THE
DEVELOPMENT AND MAINTENANCE OF
CRITERIA AND REVIEW APPROACH
DOCUMENTS**

July 2013

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

**Office of Safety and Emergency Management Evaluations
Protocol for the Development and Maintenance of
Criteria and Review Approach Documents**

July 2013

Reviewed by:



William E. Miller
Deputy Director
Office of Safety and Emergency Management Evaluations
Office of Enforcement and Oversight

7-22-13
Date

Approved by:



Thomas R. Staker
Deputy Director for Oversight
Office of Enforcement and Oversight
Office of Health, Safety and Security

7-22-13
Date

Table of Contents

1.0	Purpose	1
2.0	Applicability	1
3.0	Requirements	1
4.0	Responsibilities.....	3
5.0	References.....	4
APPENDIX A: Independent Oversight CRAD Template		A-1

1.0 PURPOSE

The purpose of this protocol is to establish the requirements and responsibilities for the development and maintenance of Criteria and Review Approach Documents (CRADs) used by the Office of Safety and Emergency Management Evaluations (HS-45). The HS-45 CRADS are carefully selected, modified (if required), and referenced in HS-45 appraisal plans. These plans are used to provide an outline of the activities planned to assess the effectiveness of safety and emergency management processes and practices used by line management and contractor organizations, as well as to evaluate their performance in protecting our workers, the public, and the environment from the hazards associated with U.S. Department of Energy (DOE) activities and sites.

2.0 APPLICABILITY

This protocol is applicable to HS-45.

3.0 REQUIREMENTS

General

1. The Office of Health, Safety and Security's (HSS) Office of Safety and Emergency Management Evaluations' appraisal activities are to be performed in accordance with DOE Order 227.1, *Independent Oversight Program*, the *Office of Enforcement and Oversight Independent Oversight Program Appraisal Process Protocols – November 2012*, and applicable HS-45 protocols and applicable CRADs.
2. The HSS CRADs are documents used by HS-45 to assess contractor and Federal performance in accordance with applicable laws, statutes, rules, executive orders, national standards, DOE directives, DOE-approved plans and program documents, site specific procedures, and contractual requirements. All HSS CRADs are standardized and are posted on the HSS website to provide a tool for use by DOE and contractor line organizations as they prepare for HSS appraisals. Standardization of the HSS CRADs also provides for a degree of consistency in the appraisal process. Due to the unique configuration of the multiple facilities that HSS appraises, CRADs are sometimes tailored for specific reviews. These modifications can include an increase or decrease in the number and focus of appraisal criteria items, review approach items, or lines of inquiry, and will typically be discussed in the specific appraisal plan that is developed for each appraisal. All CRAD modifications must be approved by the HS-45 Director or Deputy Director, or their designee.
3. Criteria and Review Approach Documents must contain the following sections:
 - Purpose section (generic purpose statement as shown in Appendix A). This section also includes reference to Department directives that establish responsibilities or requirements associated with the subject area as appropriate.
 - Applicability section (statement regarding who is approved to use the CRAD as shown in Appendix A).

- Feedback section (generic statement regarding methods to provide feedback as shown in Appendix A).
 - Body section containing the Criteria and Review Approach.
4. The body section of HSS CRADs will contain the following elements:
- **Criteria** - The criteria shall consist of the programmatic elements that are to be reviewed in the appraisal. These requirements are generally directive, regulation, or standard-based and each criterion should, therefore, include a reference to the source document (denoted in parentheses at the end of the statement or in a statement above the criterion). Review criteria are rooted in DOE requirements and serve as the baseline for the evaluation policies, programs, and actions.
 - **Review Approach** – The review approach includes both activities and lines of inquiry as discussed below. These can be combined for short sections or listed separately.
 - **Activities** - Review activities provides a description of the types of activities that will be performed during the appraisal. This normally includes listings of the types of documents to be reviewed (examples: directives, policies, program descriptions, procedures, instructions guidance, training records, assessments, causal analyses, corrective action plans, etc.), activities to be observed (examples: walkdowns, operational awareness, meetings, work evolutions, maintenance, investigations, etc.), and interviews to be conducted (examples: managers and staff, training personnel, subject matter experts, emergency response personnel, facility representatives, etc.).
 - **Lines of Inquiry** - The lines of inquiry will typically consist of a series of questions leading to a conclusion about the acceptability of the criteria being evaluated and are used to determine programmatic strengths and weaknesses.

Appendix A provides examples of suitable criteria and review approaches.

5. The following steps will be used in the development of a CRAD:
- a. Notify the Director or the Deputy Director of HS-45 of the intent to develop a new CRAD or update an existing CRAD. Obtain permission before proceeding; management will verify that the new or updated CRAD is needed and that the employee updating the CRAD has the necessary qualifications and experience to perform the task.
 - b. Obtain the CRAD template or the current CRAD from the HS-45 Management Analyst.
 - c. Create or modify the document using template format.
 - d. Perform a document peer review by HS-45 staff and a representative of the Office of Primary Interest for the subject area.
 - e. Request the HS-45 Management Analyst to format and complete a review of the document.

- f. Submit the document to the Director or the Deputy Director of HS-45 for approval.
 - g. After approval, the HS-45 Management Analyst adds the updated or new CRAD to the HSS website and removes the out-of-date CRAD as necessary.
6. CRADs will be updated to ensure that they are current when new or revised source documents are issued and in support of continuous improvement. As a minimum each CRAD will be evaluated biannually (every 2 years) to ensure that changes have been made to incorporate new or revised source documents.

Existing CRADs can be found at the following website link:

http://www.hss.doe.gov/indepoversight/safety_emergencymgt/guidance.html

4.0 RESPONSIBILITIES

Director and/or Deputy Director, Office of Safety and Emergency Management Evaluations

- Approves CRADs.
- Assigns the appropriate HS-45 technical staff subject matter expert to update, create, and maintain CRADs.
- Ensures that the subject matter expert updating or creating CRADs possess qualifications, competencies, and experience commensurate with their assignments and are free of any potential conflict of interest.
- Ensures CRADs are updated in accordance with new or revised requirements and are in support of continuous improvement; at a minimum biannually (every 2 years).

HSS Subject Matter Experts (SME)

- Ensures that SME qualifications are up-to-date prior to creating or updating CRADs.
- Reviews CRADs periodically and when referenced requirements change to ensure that the information contained in the CRAD is current.
- Provides recommendations for revisions to CRADs based on the issuance of new or revised source documents and in support of continuous improvement.

HS-45 Management Analyst

- Maintains CRAD templates.
- Formats CRADs prior to placement on the HSS website.
- Supports the Director in assuring that CRADs are maintained current and reviewed at a minimum biannually (every 2 years).

- Adds updated and new CRADs to the HSS website.
- Removes out-of-date CRADs from the HSS website.

5.0 REFERENCES

- *Office of Enforcement and Oversight Independent Oversight Program Appraisal Process Protocols*, dated November 2012.

APPENDIX A

Independent Oversight CRAD Template

<p align="center">U.S. Department of Energy</p> <p align="center">Office of Safety and Emergency Management Evaluations</p> <p align="center">Criteria and Review Approach Document</p>	<p>Subject: (enter name of CRAD) Criteria and Review Approach Document</p> <hr/> <p>Director, Office of Safety and Emergency Management Evaluations</p> <p>Date:</p> <hr/> <p>Lead, (enter name)</p> <p>Date:</p>	<p>HS: HSS CRAD 45-??</p> <p>Rev: (enter Rev. #)</p> <p>Eff. Date:</p> <p align="center">Page 1 of ?</p>
---	---	---

1.0 PURPOSE

Within the Office of Health, Safety and Security (HSS), the Office of Enforcement and Oversight, Office of Safety and Emergency Management Evaluations (HS-45) mission is to assess the effectiveness of those safety and emergency management systems and practices used by line and contractor organizations in implementing Integrated Safety Management; and to provide clear, concise, and independent evaluations of performance in protecting our workers, the public, and the environment from the hazards associated with Department of Energy (DOE) activities and sites.

In addition to the general independent oversight requirements and responsibilities specified in DOE O 227.1, *Independent Oversight Program*, this Criteria and Review Approach Document (CRAD), in part, fulfills the responsibility assigned to HSS in (reference source document) to (paraphrase responsibility or requirement).

A key to success is the rigor and comprehensiveness of our process; and, as with any process, we continually strive to improve and provide additional value and insight to field operations. Integral to this is our commitment to enhance our program. We continue to make CRADs available for use by DOE line and contractor assessment personnel in developing effective DOE oversight, contractor self-assessment and corrective action processes; the current revision is available at: http://www.hss.doe.gov/indepoversight/safety_emergencymgt/guidance.html.

2.0 APPLICABILITY

The following Criteria and Review Approach Document is approved for use by the Office of Safety and Emergency Management Evaluations.

3.0 FEEDBACK

Comments and suggestions for improvements on these Criteria and Review Approaches can be directed to the Director, Office of Safety and Emergency Management Evaluations, at (301) 903-5392.

4.0 CRITERIA AND REVIEW APPROACH

Examples of Criteria and Review Approach are as follows:

Criteria

Radiation protection program design including organizational structure and administration are sufficient to provide for effective implementation and control of all radiological protection activities. (10 CFR 835.101)

Review Approach

Activities: The following review activities apply to all functional areas and lines of inquiry shown below:

- Review radiation protection program plans, technical basis documentation, implementing procedures and records.
- Interview personnel including central and line radiation protection managers, staff, and subject matter experts.
- Review selected in progress work plans, procedures, permits and work activities associated with implementation of radiological protection requirements and core functions of Integrated Safety Management.
- Perform facility and building walkdowns and reviews.
- Observe selected work activities such as radiological surveys, monitoring, sampling, job coverage, training, and radiological support functions.

Lines of Inquiry:

- Is there a documented Radiation Protection Program (RPP) that adequately addresses the flow down of regulatory requirements including how each element of 10 CFR 835 is implemented?

- Are updates to the RPP submitted to DOE: whenever a change or addition to the RPP is made (if the change decreases the effectiveness of the RPP); prior to the initiation of a task not within the scope of the RPP; within 180 days of any modification to 10 CFR 835?
- Are the organizational responsibilities for radiological protection well defined and understood with staffing and resources sufficient to accomplish assigned tasks?
- Are radiological protection requirements actively administered by site/facility management and supervision and adhered to by personnel, and do managers and supervisors observe radiological protection activities to ensure adherence to established policies and procedures and to identify and correct problems?