

# memorandum

National Nuclear Security Administration  
Los Alamos Field Office  
Los Alamos, New Mexico 87544

DATE: FEB 13 2014  
REPLY TO:  
ATTN OF: Fred Bell  
SUBJECT: Los Alamos Field Office Self-Assessment Report of the Verification of the Closure of Federal Training & Qualification Deficiencies

TO: Kim Davis Lebak, Manager, Los Alamos Field Office

References:

1. DOE O 426.1, *Federal Technical Capability*
2. DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*
3. MP 00.15 Rev 0, *LASO Self-Assessments for Federal Operations*
4. MP 02.04 Rev 5, *LASO Technical Qualification Program Management Procedure*
5. MP 06.05 Rev. 2, *Facility Representative Training and Qualification*
6. LASO WI 00.10, Rev 0, *ePegasus Correspondence and Action Tracking Instructions*
7. LASO WI 00.14 Rev. 0, *Federal Issues Management*
8. LASO WI 00.13 Rev 0, *LASO Annual Assessment Planning*
9. CDNS Biennial Review of LASO, August 1, 2012, and associated corrective actions and records
10. Los Alamos Site Office Technical Qualification Program Self-Assessment Report, January 10-13, 2011

This memorandum transmits the Los Alamos Field Office Verification of the Closure of Federal Training & Qualification Deficiencies Self-Assessment Report. The purpose of the self-assessment was to provide Los Alamos Field Office management specific information related to effectiveness of the closure documentation of Federal Training and Qualification (T&Q) deficiencies identified by a recent self-assessment and by a CDNS Biennial review. This self-assessment is identified as ASM-FO-10.2.2012-469808 in the ePegasus Information Management System.

As identified in the attached report, the assessment team concluded that the assessment objective was met; however, two findings and two observations were identified. The findings noted are related to incomplete identification of expectations for management of actions in ePegasus and isolated examples of completed actions not effectively resolving the identified issues.

Please direct questions related to the attached report to Jaime Navarro at (505) 667-1517.



Fred Bell  
Supervisor  
Safety Engineering Team

Attachment

cc w/attachment:

J. Yarrington, HS-10

P. Jenkins, NA-MB-42

M Duvall, NA-LA

AMs, NA-LA

J. Eichorst, NA-LA

R.T. Davis, DNFSB, NA-LA

J. Plaue, DNFSB, NA-LA

R. Verhaagen, DNFSB, NA-LA

Records Center, NA-LA

FO:40JN-560824

**U.S. Department of Energy  
National Nuclear Security Administration  
Los Alamos Field Office**



**Self-Assessment for the  
Verification of the Closure of Federal  
Training & Qualification Deficiencies**

**February 2014**

**Signature Page**

Team member concurrence:

  
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Jaime Navarro  
Los Alamos Field Office TQP Manager

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## **I. Executive Summary**

This self-assessment for the Verification of the Closure of Federal Training & Qualification Deficiencies was conducted to provide Los Alamos Field Office (NA-LA) management specific information related to effectiveness of the closure actions for Federal Training and Qualification (T&Q) deficiencies identified by a recent self-assessment and by a CDNS Biennial review. The conclusion of this assessment is that most deficiencies have corrective actions assigned that are effectively completed and adequately documented.

The assessor found that NA-LA does not have specific requirements for timely action closure or to ensure Federal actions are appropriately corrected and closed in the ePegasus action management system. A Work Instruction, WI 00.14, "Federal Issues Management" provides instructions for entering Federal issues into the ePegasus action management system and for grading issues, however, it does not provide direction for time to close actions nor a process to ensure actions are appropriately corrected and closed. For this reason, the evaluation of time to closure and appropriate action closure was a subjective evaluation based on common expectations; consequently, implementation weaknesses are identified as observations. The elements of an actions management program are outside the originally defined scope of this assessment; however, because of these weaknesses in the NA-LA action management identified herein and in other reviews, lack of Field Office program guidance in these areas is identified as a finding against the DOE O 226.1 requirements.

All of the assessment objectives were met with the following findings and observations identified:

**Finding 1:** NA-LA does not have defined expectations for ePegasus Information Management System action management to ensure that problems are evaluated and appropriately corrected on a timely basis as required by DOE O 226.1b, paragraph 4.b(4).

**Finding 2:** ePegasus actions ACT-FO-5.24.2011-350081, -350095, and ACT-BA-8.23.2012-460827 were closed without correcting the identified issue contrary to the requirements of DOE O 226.1b, paragraph 4.b(4).

**Observation 1:** ePegasus actions ACT-FO-5.24.2011-350087, -350089, -350091 to implement the Job Task Analysis evaluation for Site Specific Qualification Standards have not been closed in a timely manner. These actions have been open for 29 months at the risk of having staff qualifying to Site Specific Qualification Standards that do not result in qualification meeting the needs of the assigned position.

**Observation 2:** ePegasus action ACT-OOM-5.24.2011-350105 was closed without attaching the evidence of closure. Without evidence of closure there is no record that demonstrates effective action closure.

## **II. Introduction**

Federal technical capability is necessary for the Department of Energy to accomplish its mission in a safe and efficient manner. The Training and Qualifications (T&Q) Program establishes a process to ensure its federal technical employees possess the necessary knowledge, skills, and abilities to perform their assigned duties.

Federal staff training is conducted in accordance to DOE O 360.1C, *Federal Employee Training*. Technical qualification is conducted in accordance with DOE Order 426.1, *Federal Technical Capability*, and LASO Management Procedure 02.04, *LASO Technical Qualifications Program*. The purpose of this self-assessment was to evaluate the effectiveness of the closure actions that resulted from the T&Q deficiencies documented by a recent self-assessment and CDNS Biennial review.

## **III. Scope and Methodology**

The scope of this self-assessment was to verify and document that T&Q actions were effectively closed, and to ensure the closure actions and/or deliverables were completed as identified in the Corrective Action Plans (CAPs) that were developed to resolve issues identified in the following assessments:

- Los Alamos Site Office Technical Qualification Program Self-Assessment Report, January 2011 (ePegasus record COR-FO-5.24.2011-350069), and
- CDNS Final Report of the Los Alamos Site Office Biennial Review of Nuclear Safety Performance, August 1, 2012 (ePegasus record COR-OOM-8.8.2012-457153).

The T&Q corrective actions were identified in the following documents:

- Corrective Action Plan for the Technical Qualification Program Self-Assessment, May 2011 (ePegasus record COR-FO-5.24.2011-350069), and
- Los Alamos Site Office Corrective Action Plan for the Biennial Review of Nuclear Safety Performance, August 30, 2012 (ePegasus record COR-SO-8.21.2012-460231).

The self-assessment was performed in accordance with Los Alamos Field Office Management Procedure (MP) 00.15, Rev. 0, *LASO Self-Assessments for Federal Operations*, utilizing criteria identified in Self-Assessment Plan for the Verification of the Closure of Federal Training & Qualification Deficiencies, transmitted by COR-FO-10.1.2013-539196, dated October 8, 2013. The specific assessment criteria are repeated in Section V of this report in the results discussion for the objective.

The assessment used the following definitions to categorize identified issues in accordance with

*MP 00.12, Independent Assessment Process:*

**Findings:** Findings are violations of an applicable requirement or established performance criterion. Findings require corrective action and should be based upon: (1) regulatory requirements, (2) contract compliance requirements that involve necessary functions or could impact safety or quality assurance, (3) a number of related performance issues, (4) lack of necessary administrative controls, or (5) significant programmatic, effectiveness or safety related issues.

**Observations:** Observations are problems or conditions that are of concern to the Los Alamos Field Office team member that, if left unaddressed, could lead to non-compliance with requirements, but is not a violation of requirements.

The assessment team included:

Jaime Navarro, Los Alamos Field Office TQP Manager

#### **IV. Results**

This assessment concluded that the Los Alamos Field Office has for the most part effectively resolved the T&Q issues identified in the referenced assessments. There are 3 actions remaining open, and 4 actions that were not closed properly, but in general, the remaining 21 actions were closed timely and properly.

Following are the findings/observations identified in this assessment:

**Finding 1:** NA-LA does not have defined expectations for ePegasus Information Management System action management to ensure that problems are evaluated and corrected on a timely basis as required by DOE O 226.1b, paragraph 4.b(4).

**Finding 2:** ePegasus actions ACT-FO-5.24.2011-350081, -350095, and ACT-BA-8.23.2012-460827 were closed without correcting the identified issue contrary to the requirements of DOE O 226.1b, paragraph 4.b(4).

**Observation 1:** ePegasus actions ACT-FO-5.24.2011-350087, -350089, -350091 to implement the Job Task Analysis evaluation for Site Specific Qualification Standards have not been closed in a timely manner. These actions have been open for 29 months at the risk of having staff qualifying to Site Specific Qualification Standards that do not result in qualification meeting the needs of the assigned position.

**Observation 2:** ePegasus action ACT-OOM-5.24.2011-350105 was closed without attaching the evidence of closure. Without evidence of closure there is no record that demonstrates effective action closure.

Details of evaluation and discussions supporting the identified findings and observations follow under the discussion for the objective. A consolidated list of findings and observations is

included in Section VI, Issue Summary.

## **V. Specific Criteria, Observations and Evaluations**

**Objective:** Verify that corrective actions have been completed and documented with objective evidence such that T&Q Program identified issues are effectively resolved and closed.

**Criteria:**

1. Identified issues are evaluated for relevance and corrective actions are appropriately specified that when implemented resolve the issues.
2. Corrective actions are entered into ePegasus for tracking and management.
3. Corrective actions are closed in a timely manner.
4. Objective evidence included in the ePegasus record is adequate to demonstrate that the intent of the corrective action has been met by the actions taken (appropriately closed).

### **Results:**

The Objective was met since the assessment determined that the majority of the deficiencies evaluated had corrective actions assigned that were responsive to the identified issue, and the corrective actions were effectively completed and adequately documented. However, the assessor found that NA-LA does not have specific requirements for timely action closure or to ensure Federal actions are appropriately corrected and closed. A Work Instruction, WI 00.14, "Federal Issues Management" provides instructions for entering Federal issues into the ePegasus action management system and for grading issues, nonetheless, it does not provide direction for time to close actions nor a process to ensure actions are appropriately corrected and closed. For this reason, the evaluation of time to closure and appropriate closure was a subjective evaluation based on common expectations; accordingly, implementation weaknesses are identified as observations. Although the specific elements of an actions management program are outside the originally defined scope of this assessment, the weaknesses in the NA-LA action management system identified herein and in other reviews is identified as a finding against the DOE O 226.1 requirements.

In summary, the review identified that between both prior assessments, there were a total of 7 Findings, 2 Weaknesses, and 5 Areas for Improvement (AFIs), which resulted in the development of 28 actions in ePegasus (a subset of actions as a result of one action to track TQP participants to read training slides was not included in this count). Concerns were identified with

the effectiveness of closure actions, timeliness of action, or documentation of actions taken for 7 of the 28 actions reviewed.

**Finding 1:** NA-LA does not have defined expectations for ePegasus Information Management System action management to ensure that problems are evaluated and appropriately corrected on a timely basis as required by DOE O 226.1b, paragraph 4.b(4).

NA-LA Work Instruction WI 00.14, "Federal Issues Management", has instructions for grading, tracking and entering Federal issues into the ePegasus Information Management System, however, it lacks defined expectations to ensure that, 1) problems are corrected on a timely basis as required by DOE O 226.1b, paragraph 4.b(4), and 2) actions are appropriately corrected and closed.

The information following the description of Finding 2, Observation 1 and Observation 2 includes:

- Identification of the Corrective Action Plan that identifies the action discussed,
- The issue being addressed,
- The identified ePegasus Action Number, Action Subject and Deliverable, and
- Discussion of the concern with the action management

**Finding 2:** ePegasus actions ACT-FO-5.24.2011-350081, -350095, and ACT-BA-8.23.2012-460827 were closed without correcting the identified issue contrary to the requirements of DOE O 226.1b, paragraph 4.b(4).

- **Corrective Action Plan for the Technical Qualification Program Self Assessment, May 2011**
- **AFI 2-2:** Site-specific qualification standard formats are not standardized.
- **ePegasus Action Number: ACT-FO-5.24.2011-350081, closed**

Action Subject: Revise LASO Site-Specific Qualification Standard Management Procedure (MP) 11.12, *Office of Quality Assurance Training and Qualification*, to utilize the DOE FAQ format and demonstrate appropriate LASO approvals.

Deliverable: Revised LASO Site-Specific Qualification Standard, Office of Quality Assurance Training and Qualification.

- **Discussion of Concern:** A memorandum from the Manager of the Office of Quality Assurance was issued on May 25, 2011, to provide justification for not providing the deliverable required in the CAP. It stated that: 1) the CAP did not correctly describe MP 11.12, because it is not a Site Specific Qualification Standard, since it does not include learning objectives, training instructions, nor specific qualifications requirements, and 2) that the approval signature (from the Manager of Quality Assurance) was appropriate

because the requirement for the Field Office Manager to approve all Management Procedures was effective on a date after it had been approved by the Manager of Quality Assurance.

Although it is accurate that MP 11.12 does not include the items listed in the referenced memorandum, it is used as a qualification standard for staff qualifying to quality assurance functional area qualification standards and is identified as a Site-Specific Qualification Standard on the Field Office Technical Qualification Program webpage. Additionally, the current Quality Assurance Site-Specific Qualification Standard continues to not document technical position qualification requirements that are derived using the systematic approach to training, as required by DOE O 426.1 (and also identified in this assessment finding F 4.1 below). The statement in the above memorandum regarding the correct approval signature is no longer valid since the MP was updated in 2012, and was again not approved by the Field Office Manager. This AFI was inappropriately closed.

- **Corrective Action Plan for the Technical Qualification Program Self Assessment, May 2011**
- **F 4-1:** Site-specific competencies are not developed using the systematic approach to training methodology.
- **ePegasus Action Number: ACT-FO-5.24.2011-350095, closed**

Action Subject: Evaluate LASO Site Specific Qualification Standards utilizing Job Task Analysis methods. Revise Standards to improve, add or delete competencies, and validate or revise knowledge level (familiarity, working level, expert) as indicated appropriate by the analysis.

Deliverable: Revised LASO Site-Specific Qualification Standard, *Office of Quality Assurance Training and Qualification*.

- **Discussion of Concern:** Similar to closure of AFI 2-2 above, the same memorandum from the Manager of Quality Assurance, dated 5/22/2011, was utilized to justify not revising the existing Quality Assurance Site Specific Qualification Standard (SSQS) with the argument that since the standard does not meet the requirements of an SSQS, then it is not an SSQS and therefore no Job Task analysis (JTA) is required. However, since the management procedure is utilized as an SSQS, it should be developed and revised to meet the applicable requirements. As with AFI 2-2, the deliverable did not address the action item. This finding was inappropriately closed.
- **Los Alamos Site Office Corrective Action Plan for the Biennial Review of Nuclear Safety Performance, August 30, 2012**
- **FED T&Q.1-1/F:** Although the available evidence shows LASO achieving most of the requirements in Sections 4 and 5 of DOE O 360.1C, it cannot be confirmed that all the

requirements of the order are being implemented for all assigned Federal employees who support or oversee work in defense and other nuclear facilities.

- **ePegasus Action Number: ACT-BA-8.23.2012-460827, closed**

Action Subject: Review DOE O 360.1C and revise LASO procedures as necessary to ensure requirements are flowed into LASO implementing procedures to address CDNS Review Finding T&Q.1-1/F.

Deliverable: Review DOE O 360.1C, NNSA Policy Letter NAP-17 and Business and Operating Procedure BOP 02.07. Revise LASO procedures as necessary to ensure requirements are flowed into LASO implementing procedures. Revise procedures as necessary or provide a statement indicating why no revisions were necessary.

- **Discussion of Concern:** The action was closed although no Attachments and no Related Items are included in the ePegasus Information Management System demonstrating completion of an action that addresses the finding. Status in ePegasus states: “finding/resolution will be added to the Los Alamos Field Office Handbook and Training Needs Assessment to satisfy the CDNS review” however, there were no ePegasus actions referred to for tracking completion of either the Handbook revision or the Training Needs Assessment. Although this finding was inappropriately closed, this issue was recently reopened in response to this finding in the ePegasus system under item ACT-BA-12.11.2013-552070, “Update Field Office Federal Employee Handbook to reflect Resolution of CDNS Review Finding T&Q.1-1/F.”

**Observation 1:** ePegasus actions ACT-FO-5.24.2011-350087, -350089, -350091 to implement the Job Task Analysis evaluation for Site Specific Qualification Standards have not been closed in a timely manner. These actions have been open for 29 months at the risk of having staff qualifying to Site Specific Qualification Standards that do not result in qualification meeting the needs of the assigned position.

- **Corrective Action Plan for the Technical Qualification Program Self Assessment, May 2011,**
- **F 4-1:** Site-specific competencies are not developed using the systematic approach to training methodology. (DOE O 426.1, paragraph 4.b.(4)).
- **ePegasus Action Number: ACT-FO-5.24.2011-350087, open**

Action Subject: Evaluate LASO Site Specific Qualification Standards (SSQS) utilizing Job Task Analysis methods. Revise Standards to improve, add or delete competencies, and validate or revise knowledge level (familiarity, working level, (expert) as indicated appropriate by the analysis.

Deliverable: Revised LASO Site-Specific Qualification Standard, Facility Representative

Phase I Qualification Standard.

- **ePegasus Action Number: ACT-FO-5.24.2011-350089, open**

Action Subject: Evaluate LASO Site Specific Qualification Standards (SSQS) utilizing Job Task Analysis methods. Revise Standards to improve, add or delete competencies, and validate or revise knowledge level (familiarity, working level, (expert) as indicated appropriate by the analysis.

Deliverable: Revised LASO Site-Specific Qualification Standard, Facility Representative Phase II Qualification Standard.

- **ePegasus Action Number: ACT-FO-5.24.2011-350091, open**

Action Subject: Evaluate LASO Site Specific Qualification Standards (SSQS) utilizing Job Task Analysis methods. Revise Standards to improve, add or delete competencies, and validate or revise knowledge level (familiarity, working level, (expert) as indicated appropriate by the analysis.

Deliverable: Revised LASO Site-Specific Qualification Standard, Subject Matter Expert Qualification Standard.

- **Discussion of Concern:** As a result of the finding that identified that site-specific competencies were not developed using the systematic approach to training methodology there was an action (see above) assigned to each of the Field Office organizations that was responsible for a Site Specific Qualification Standard. Two of the Site Specific Qualification Standards, Safety System Oversight and Emergency Directorate Representative, were reviewed, job task analyses completed, and the Standard revised as necessary. Although there has been effort to develop final JTA based SSQs for the remaining areas, lack of resources to support development of these products has resulted in continuous delays towards completing the efforts; therefore, the three standards identified above have not been reviewed and the actions remain open. A fourth standard is the subject of Finding 2, above. Failure to properly develop and periodically review Site Specific Qualification Standards can result in staff being assigned to complete competencies that may not support their assigned functions.

**Observation 2:** ePegasus action ACT-OOM-5.24.2011-350105 was closed without attaching the evidence of closure. Without evidence of closure there is no record that demonstrates effective action closure.

- **Corrective Action Plan for the Technical Qualification Program Self-Assessment, May 2011,**
- **FI 6-1:** Technical qualification program requirements are not well integrated with personnel-related activities.

- **ePegasus Action Number: ACT-FO-5.24.2011-350105. Closed.**

Action Subject: Revise the recruitment or hiring checklist to include FTCP Agent participation in recruiting and hiring for STSM positions.

Deliverable: Copy of checklist.

- **Discussion of Concern:** Status in ePegasus states action was completed; however, a revised recruiting or hiring checklist was not attached as evidence. Discussion with FTCP Agent indicates he is now participating in recruiting/hiring for STSM positions so it appears the issue was resolved however there is no evidence of a revised recruitment or hiring checklist in ePegasus at the time of the evidence review. The checklist was recently attached to the ePegasus action for evidence and no further action is necessary.

## VI. Issue Summary

**Finding 1:** NA-LA does not have defined expectations for ePegasus Information Management System action management to ensure that problems are evaluated and corrected on a timely basis as required by DOE O 226.1b, paragraph 4.b(4).

**Finding 2:** ePegasus actions ACT-FO-5.24.2011-350081, -350095, and ACT-BA-8.23.2012-460827 were closed without correcting the identified issue contrary to the requirements of DOE O 226.1b, paragraph 4.b(4).

**Observation 1:** ePegasus actions ACT-FO-5.24.2011-350087, -350089, -350091 to implement the Job Task Analysis evaluation for Site Specific Qualification Standards have not been closed in a timely manner. These actions have been open for 29 months at the risk of having staff qualifying to Site Specific Qualification Standards that do not result in qualification meeting the needs of the assigned position.

**Observation 2:** ePegasus action ACT-OOM-5.24.2011-350105 was closed without attaching the evidence of closure. Without evidence of closure there is no record that demonstrates effective action closure.

## VII. Documents Reviewed

- a. DOE O 426.1, *Federal Technical Capability*
- b. DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*
- c. LASO MP 00.15 Rev 0, *LASO Self-Assessments for Federal Operations*
- d. LASO MP 02.04 Rev 5, *LASO Technical Qualification Program Management Procedure*
- e. LASO MP 06.05, Rev. 2, *Facility Representative Training and Qualification*
- f. LASO WI 00.10, Rev 0, *ePegasus Correspondence and Action Tracking Instructions*

- g. LASO WI 00.14 Rev. 0, Federal Issues Management
- h. LASO WI 00.13 Rev 0, *LASO Annual Assessment Planning*
- i. LASO Integrated Assessment Schedule
- j. LASO SET FY13 Planned Assessment Schedule
- k. CDNS Biennial Review of LASO, August 1, 2012, and associated corrective actions and records
- l. *Los Alamos Site Office Technical Qualification Program Self-Assessment Report*, January 10-13, 2011
- m. *Corrective Action Plan for the Technical Qualification Program Self-Assessment*, May 2011