



Savannah River Operations Office

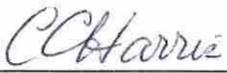
Office of Safety and Quality Assurance

Self-Assessment of the Technical Qualification Program

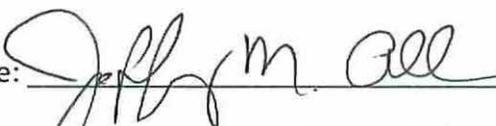
June 2010

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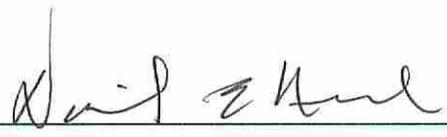
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Executive Summary

TQP-C1: The Technical Qualification Program (TQP) at DOE-SR is in need of significant improvement and senior management attention will be required to correct the identified deficiencies.

There are numerous deficiencies that have been identified by this team and by previous internal and external independent assessments. These deficiencies collectively form the basis for the above listed concern. They include:

- Implementing procedures are old (May 2005/April 2006 issue dates), have exceeded the biennial review requirement specified in SRIP 200, Chapter 251.4, Section 5.5, for the periodic review and revision of directives; do not reflect the current organization (e.g., HRMDD versus OHCM); and are not always in accordance with the current processes used today to manage and administer the program (e.g., stoplight chart process, qualifying official process, extension/suspension process, etc.). This has led to a situation where roles, responsibilities and authorities are not well understood by DOE-SR staff. In addition, the DOE-SR ability to fully demonstrate compliance with or demonstrate an appropriate flow down of directive requirements is not supported. The office has been working on a draft revision to the implementing procedures for over two years.
- Insufficient resources have been applied to the TQP (inadequate personnel resources to adequately manage and administer the program; the financial resources to carry out critical required training; and, adequate funding to support travel for training). Further complicating the situation was the removal of about 60% of the funding (last year) to conduct training required to support TQP qualifications (to ensure that proficiency is maintained); to support professional staff in the maintenance of professional licenses and certifications; and, to support that training needed to prepare the office's best performers to qualify for positions of increased responsibility and authority.
- Since November 19, 2009, eight senior DOE-SR managers have initially qualified to the Senior Technical Safety Manager (STSM) Functional Area Qualification Standard without completing a comprehensive written examination. DOE Order 426.1 requires the comprehensive written examination for initial STSM qualification and this order was issued November 19, 2009. Others at DOE-SR are currently completing the STSM initial qualification without the requirement to complete a comprehensive written examination.
- Over the last year, several DOE-SR managers have exceeded qualification dates for qualification or re-qualification to the STSM FAQS. In each of the recent cases, the six month extension required by SRM 300.1.1B, although likely appropriate were not routed for approval. Additionally, Managers do not always follow implementing directive requirements with regard to supervised personnel exceeding required qualification dates. In a dozen or more cases in the last year subordinates exceeded qualification dates (some

by several months) without negative personnel impacts required by the implementing directive.

- DOE-SR management and supervisors have not always reviewed, discussed, and approved Individual Development Plans (IDPs) or used those IDPs to develop and implement annual training needs analysis, annual training plans, and annual training summary reports required by DOE Manual 360.1-1B, *Federal Employee Training Manual*, Sect I, and Section V. This has resulted in inadequate planning for all federal training, including that associated with the TQP.
- The current condition of formal training and qualification records fails to support DOE-SR's ability, in some cases, to demonstrate appropriate technical qualification of the staff and support the transportability of qualifications as required by DOE directives.
- Some DOE-SR organizations (i.e., Performance Assurance Division, Technical Support Division, etc.) continue to need, but do not have knowledge, skills, and abilities specific to the position, facility, program, and/or office in accordance with DOE Order 426.1 and SRM 300.1.1B.
- DOE-SR continues to struggle with implementing an adequate continuing training program to ensure that personnel qualified to functional area qualifications remain proficient.
- The current situation with regard to staffing and critical hires, coupled with 1) an aging workforce where many individuals are now or will soon be eligible for retirement; and, 2) the incentivized FY2011 VERA/VSIP buyout program (where critical positions may not be protected) are likely to directly impact the TQP, requiring even larger numbers of personnel to be trained and qualified to support mission accomplishment.

Recommendations include:

- The Federal Technical Capability Program Agent position should be restored (to at least the Deputy Manager level to clearly communicate expectations relative to the organization's value of an effective training program; and, to ensure effective direction to correct the identified concern and deficiencies.
- A senior management TQP champion is needed. Requirements are not being met, the program has been allowed to atrophy, and senior management commitment and "buy-in" will be needed to ensure qualifications are commensurate with assigned responsibilities, and to ensure that the DOE-SR TQP adequately supports mission accomplishment in the future.

- The Site Office Manager should evaluate the adequacy of the initial qualification of the STSMs qualified since the issuance of DOE Order 426.1 (on November 19, 2009) that established a requirement for the satisfactory completion of a written comprehensive examination as a condition of qualification. For any other personnel initially qualifying to the STSM qualification standard, the Site Office Manager should evaluate if TQRs should be amended (and time extensions authorized) to include the requirement for the written comprehensive examination, as required by the order.

Introduction

During the period June 7-11, 2010, an assessment team, comprised of a Team Leader and a second evaluator from the Office of Health, Safety, and Security, Office of Independent Oversight and the TQP Manager and a support services contractor from the Office of Human Capital Management, Savannah River Operations Office (DOE-SR), conducted the field work associated with a self-assessment of the DOE-SR Technical Qualification Program (TQP). For the purposes of this review, and in accordance with guidance from the Federal Technical Capability Panel (FTCP), the Team Leader is a qualified Senior Technical Safety Manager with extensive experience in the evaluation of training and qualifications programs. The Team Leader is to have a direct reporting relationship to the Field Element Manager (FEM). The primary objective was to measure the effective implementation of the DOE-SR TQP.

Scope and Methodology

A set of disciplined Criteria, Review, and Approach Documents (CRADs) were developed by the Team Leader utilizing criteria and objectives provided on the FTCP website. Specific “lines of inquiry” were tailored to the organization and assessment processes of the DOE-SR. The Team Leader selected a team of a senior nuclear engineer with significant assessment experience, the DOE-SR Training Manager and a senior support service contractor that routinely supports the TQP at DOE-SR. In the weeks prior to the accomplishment of the self-assessment, site and headquarters team members read applicable directives and site source level implementing documentation. Team members were provided TQP data and that data was analyzed to prepare a set of generic questions (aimed at answering specific lines of inquiry) and specific questions relative to members assigned to the directorates within the Operations Office. Interviews of managers, training personnel, and other appropriate individuals were conducted during the week of June 7-11, 2010 at the site.

Results

Out of seven specific CRADs with specific criteria, six were partially met, and one was judged to be fully satisfactory.

The Team has identified one concern, 15 deficiencies, 5 observations, and 1 good practice that are further described following the “Assessment Results” section of each individual set of criteria, TQP-1 through TQP-7.

TQP-1, Demonstration of Competence. The program clearly identifies and documents the process used to demonstrate employee technical competence.

Criteria:

- 1.1 At minimum, personnel providing management direction or oversight that could impact the safe operation of a defense nuclear facility have been identified as TQP participants.
- 1.2 IDPs, training plans, technical qualification records, or other related documents are updated to reflect the activities required for each individual to satisfy competencies.
- 1.3 A formal evaluation process is in place to objectively measure the technical competency of employees. The rigor of the evaluation process is commensurate with the responsibilities of the position.

Assessment Results:

Most of the technically trained individuals that meet requirements for inclusion in the TQP are appropriately assigned to the TQP, and have position descriptions that indicate that the individuals are required to participate in the TQP. A data call of personnel within specific series (e.g., GS-800 engineer series, GS-1301 physical scientists, etc.) was “cross-walked” to a list of TQP participants. Persons not participating in the TQP that have duties that are likely to meet the test for inclusion in the TQP, generally fell into four categories. Personnel with suspended qualifications; project management and federal project directors not previously required to participate in the TQP; personnel in transition between positions; and, personnel in safeguards and security (S&S) positions that were not previously required to participate in the TQP.

An informally implemented program documenting a qualification extension/suspension process is not adequately described in DOE-SR implementing directives and this has resulted in personnel not being assigned to the TQP as required. SRM-300.1.1B, section 5.3.1 states that participants have 18 months to complete TQP qualification. Section 5.3.15 states that an extension is requested in writing from the AM/OD and submitted to HRMDD (now OHCM). The extension request states the reason for the request and a reasonable date for completion. Documentation for an extension includes a completed TQP Extension Request Form (SR 356). Acceptable reasons for an extension include a lengthy and/or serious illness as defined by the Office of Personnel Management, DOE, and DOE-SR leave regulations; an extended detail; a reorganization, extended travel, military deployment, etc.” DOE Manual 360.1-1B, page V-1, paragraph 2.a. states “Technical Qualification Programs specifically apply to DOE technical employees whose duties and responsibilities require them to provide assistance, guidance, direction, or oversight that could affect the safe operation of a defense nuclear facility, including evaluation of contractor activities at those facilities. This includes personnel designated as Senior Technical Safety Managers and employees who are on extended detail or temporary assignment (i.e., 90 days or longer).” SRM-300.1.1B, section 5.1.9 states that “Individuals detailed, temporarily promoted, or assigned to TQP designated PDs in an acting

capacity are not required to participate in the TQP.” This is not in accordance with the requirement of DOE Order 360.1B. (See Deficiency TQP-1-D1)

DOE-SR has chosen to informally implement (in advance of procedure approval) a qualification suspension process described in a draft revision to SRM-300.1.1B. Currently there are two staff members in AMWDP that have been placed on suspended qualifications (previously assigned to qualify to the Waste Management standard). Their original 18 month qualification dates of October 28, 2009 were extended to February 28, 2010. Their qualifications were suspended effective November 24, 2009 and December 24, 2009 respectively. The justifications provided said one was acting as the Tank 48 Federal Project Director, until a qualified individual could be identified and assigned. The other person is suspended due to work load associated with the Contract Performance Baseline Review for the Liquid Waste contract. Both individuals are currently engaged in activities applicable to the Waste Management FAQS. This seems to amount to an informal extended detail, without the benefit of a defined set of duties and responsibilities, and without the controls associated with a formal detail. Why is there a need for qualification suspension process where a formally approved personnel detail process is in place to cover this situation? (See Deficiency TQP-1-D1)

Some DOE-SR Federal Project Directors and Project Management Personnel required to be in the TQP are not in the program. As of November 19, 2009 DOE Order 426.1, *Federal Technical Capability*, page 5, paragraph (3)(a) requires that “Individuals with assigned project management responsibilities for defense nuclear facilities, must be qualified through a combination of the project manager’s career development program...the General Technical Base (GTB) Qualification Standard, and the appropriate site and/or facility specific standard(s).” Some Federal Project Directors (FPDs) and personnel with project management duties (i.e., one FPD in AMWDP, two FPDs in AMNSP-NMPD, and ten in AMIP) are not currently in the TQP. (See Deficiency TQP-1-D2)

TQP personnel participation, in some cases, is not adequately managed during personnel transition between positions in the organization. Specific examples include:

1. A GS-801-15 with a position description in AMWDP that required participation in the TQP and qualifications to Senior Technical Safety Manager as well as Federal Project Director Level 4 and is not currently on the TQP roles.
2. An individual on extended detail from OSSES (where he was qualified as a Facility Representative) to OSQA/TSD as a Facility Representative. The members detail to OSQA/TSD began March 16, 2009, and SF-52s provided document two extensions until March 10, 2010 when the detail was terminated. The member was still performing duties in OSQA/TSD after the detail expired and it was not until May 23, 2010 that the member was reassigned to OSQA/TSD as an Occupational Health and Safety Manager, GS-0018 requiring participation in the TQP and assignment of an Occupational Safety TQR. As of the time of the assessment the required TQR was not in place and the member was not listed on the latest TQP qualification stoplight chart. OSSES allowed the members FR qualification to expire (expired January 27, 2010). (See Deficiency TQP-1-D3)

Safeguards and Security (S&S) Functional Area Qualification Standards required by NNSA and endorsed by the Federal Technical Capability Program are not required for implementation at DOE-SR. During the last year, a new S&S GTB Qualification Standard (DOE-STD-1123-2009) and a new S&S FAQs (DOE-STD-1171-2009) was developed and approved for personnel involved in S&S occupations. DOE-STD-1171-2009 states “The Safeguards and Security FAQs establishes common functional area competency requirements for all DOE safeguards and security personnel who provide assistance, direction, guidance, oversight, or evaluation of contractor technical activities that could impact the safeguards and security operations of DOE’s defense nuclear facilities.” This FAQs “...identifies the minimum technical competency requirements for DOE personnel. Although there are other competency requirements associated with the positions held by DOE personnel, this FAQs is limited to identifying the specific, common technical safeguards and security competencies required throughout DOE.” NNSA has formally promulgated direction to headquarters S&S personnel, and its site offices around the complex to assign S&S personnel to these standards. EM and HSS headquarters has not assigned S&S personnel to qualify to these standards. The FTCP has assigned action items to implement these standards and to develop the Computer Based Training for the S&S General Technical Base FAQs. Additionally, the FTCP has directed that a Senior S&S Manager FAQs (i.e., similar to STSM but for senior S&S managers) be developed and that work is going on at the NNSA Service Center. (See Observation TQP-1-O1)

Some OSSES personnel required (by the SRM-300.1.1B, Attachment A, Technical Qualification Program Decision Tree) to be in the TQP are not in the TQP. Attachment A asks “Does the position provide assistance, guidance, direction, or oversight that could affect the safe operation of a defense nuclear facility?” If the answer is affirmative, then all employees assigned to that position description must be included in the TQP. The “crosswalk” from specific series (i.e., GS-080, 801, 840, 855, 1301, 2210) resulted in the identification of 31 personnel in OSSES that may require (based on a review of a sample of position descriptions) their participation in the TQP. Of those 31, 11 are currently in the TQP, and 20 are not assigned to the TQP. (See Deficiency TQP-1-D4)

DOE-SR management and supervisors have not always reviewed, discussed, and approved Individual Development Plans (IDPs) or used those IDPs to develop and implement annual training needs analysis, annual training plans, and annual training summary reports required by DOE Manual 360.1-1B, *Federal Employee Training Manual*, Sect I, and Section V. This has resulted in inadequate planning for all federal training, including that associated with the TQP. DOE Order 426.1, page 6, paragraph (f) requires FEMs to approve TQP Plans that include the processes and requirements for establishing and/or updating IDPs, training plans, or qualification-related records. During the conduct of manager and supervisor interviews it was noted that most supervisors were requiring their personnel to have IDPs in place and most (but not all) reported that they had reviewed those plans with their personnel. DOE Order 426.1, page 14, paragraph g.(8), requires supervisors with responsibility for TQP personnel to ensure TQP qualifications are maintained current by training and assignments planned in IDPs. During Training Liaison interviews it was reported that there was a general perception among technical staff that the completion of IDPs was a waste of time as there was little if any chance of getting the identified training due to the lack of sufficient training funds.

DOE-SR has not developed and promulgated all required annual training reports in accordance with the requirements of DOE M 360.1-1B, *Federal Employee Training Manual*, Section I and V. Section I requires that annual training needs analysis (a roll-up of training needs identified in Federal personnel Individual Development Plans) are prepared. After the needs are identified, some prioritization of the identified needs must occur by the organization's management and an annual training plan is developed and promulgated. The third annual report is the annual training summary. Each DOE element must, within three months of the close of the fiscal year, complete an annual training summary that captures specified information that essentially measures performance against that which had been planned. This year end annual training summary is a necessary feedback and improvement process that captures essential training that did/did not get done, the reasons that it did/did not get completed as planned, and provides valuable input into resource requirements for the coming year. This collection of three annual reports is viewed as being what is required to adequately manage the organization's training programs. Over the course of the last two years, only one of these reports, the annual training needs analysis was produced. Additionally, based on interviews these reports are not being prepared in accordance with the requirements. The annual needs analysis is accomplished by way of data calls from the DOE-SR directorates and may not be based on a roll up of IDP data as is discussed in Chapter I. Also, the report is not generated at the beginning of the year to allow its use as a planning tool. It is now the end of 3rd quarter of fiscal year 2010 and the needs analysis is not yet complete. The organizational level training plan was developed but was not signed and issued last year. The annual training summary has not been developed for the last several years.

Most of the DOE-SR directorates had gone through some informal prioritization of training needs, and had planned for the training that they were able to support, within the allotment of dollars provided for such purposes. Most advised that they had tried to support certification and licensure of their professional personnel, and had tried to support these personnel attending continuing education requirements of the certifying/licensing organizations. Frustration was expressed by a number of managers due to the removal (over half of budgeted dollars) of planned training funds over the course of the last year. (See Deficiency TQP-1-D5)

The evaluation process described in SRM-300.1.1B is generally satisfactory to objectively measure the technical competency of employees. The rigor of the evaluation process is not commensurate with the responsibilities of the positions. There are two process descriptions currently in place at DOE-SR to implement training and qualification requirements. They are SRM 300.1.1B, Chapter 6, Section 6.1, Rev. 1, *DOE-SR Technical Qualification Program and Acquisition Career Development Program Process Procedure*, dated April 1, 2006 (herein after referred to as SRM 300.1.1B) and SRM 300.1.1B, Chapter 6, Section 6.2, Rev. 1, *DOE-SR Training and Continuing Education Processes*, dated May 16, 2005. Both of these documents have exceeded the biennial review requirement of SRIP 200, Chapter 251.4, Rev. 0, paragraph 5.5. DOE-SR has been in the process of revising these directives based on internal and independent external review comments, as well as capturing process improvements that in some cases have been implemented prior to approval of the draft implementing procedure. Additional discussion of the adequacy of these implementing procedures and the draft revision to training requirements in DOE directives is provided under discussion and deficiencies associated with TQP-3 below.

Deficiencies:

- TQP-1-D1 An informally implemented program documenting a qualification extension/suspension process is not adequately described in DOE-SR implementing directives and this has resulted in personnel not being assigned to the TQP as required.
- TQP-1-D2: Some DOE-SR Federal Project Directors and Project Management Personnel required to be in the TQP are not in the program in accordance with DOE Order 426.1, *Federal Technical Capability*.
- TQP-1-D3 TQP personnel participation, in some cases, is not adequately managed during personnel transition between positions in the organization.
- TQP-1-D4 Some OSSES personnel required (by the SRM-300.1.1B, Attachment A, Technical Qualification Program Decision Tree) to be in the TQP are not in the TQP.
- TQP-1-D5 DOE-SR management and supervisors have not always reviewed, discussed, and approved Individual Development Plans (IDPs) or used those IDPs to develop and implement annual training needs analysis, annual training plans, and annual training summary reports required by DOE Manual 360.1-1B, *Federal Employee Training Manual*, Sect I, and Section V. This has resulted in inadequate planning for all federal training, including that associated with the TQP.

Observations:

- TQP-1-O1 Safeguards and Security (S&S) Functional Area Qualification Standards required by NNSA and endorsed by the Federal Technical Capability Program are not required for implementation at DOE-SR.

Conclusion:

Personnel required to be in the TQP, not in the TQP; processes important to the administration of the program being informally implemented; and, inadequate planning for training leads the Team to conclude that the TQP-1 criteria were partially, but not fully met.

TQP-2, Competency Levels. Competency requirements are clearly defined and consistent with applicable industry standards for similar occupations.

Criteria:

- 2.1 Competency requirements include clearly defined knowledge, skill, and ability elements (KSAs).
- 2.2 Recognized experts help establish competency requirements.
- 2.3 Related professional accreditation requirements are considered in the program as applicable.
- 2.4 Competency requirements are identified in the areas listed below. (Note: this does not imply that three separate documents are required.)
 - Basic Technical Knowledge. Competency in areas such as radiation protection, occupational safety, chemical safety, nuclear safety, and environmental regulations.
 - Technical Discipline Competency. Competency in a technical discipline (e.g., mechanical engineering, chemical engineering) that can be demonstrated by education, professional accreditation, examination, or on-the-job performance.
 - Position Knowledge, Skills, and Abilities. Competencies specific to the position, facility, or program and the office.

Assessment Results:

Technically trained individuals assigned to the DOE-SR TQP are generally qualified to the historic General Technical Base (GTB) or the new Computer Based Training GTB, one or more FAQs and some have implemented position, facility, program, and/or office specific qualification standards.

All the standard FAQs are prepared by recognized experts in the appropriate technical community. The standards are approved for use by the FTCP Chair prior to issuance.

SRM 300.1.1B, Section 6.1, paragraph 5.3.5 says that equivalencies are not recommended for completing competencies. Professional licensure and/or certifications are considered as part of the job announcement and hiring processes in place at DOE-SR. Where equivalencies are not recommended for the accomplishment of competencies on technical qualifications it does not appear that related professional accreditation requirements are considered in the TQP. Per a discussion with the FTCP Agent, DOE-SR management made a decision to not recommend the use of equivalencies. They chose instead to encourage persons to demonstrate their KSAs through a checkout with an appropriate Qualifying Official. The Team considered this to be an acceptable alternative to often difficult justifications for equivalencies. (See discussion under TQP-5 for additional equivalency information)

Some DOE-SR organizations (i.e., Performance Assurance Division, Technical Support Division, etc.) appear to need, but do not have, organizational, facility, or position specific qualification standards in accordance with DOE Order 426.1 and SRM 300.1.1B. This was identified as an area needing improvement in the TQP Pre-Accreditation Review in January 2008. Per staff interviews, DOE-SR has not adequately pursued the implementation of the process described in SRM 300-1-1B, section 5.1.3 that requires line managers develop site, facility, and position-specific qualification standards. The site, facility, and position-specific qualification standards should identify the competencies required, above and beyond the functional area requirements that the employee needs to safely conduct business, enter facilities, and conduct oversight of contractor activities. Line managers are to update their site, facility, and position-specific qualification standards on an as needed basis (i.e., reorganization, mission changes or, at a minimum, every three (3) years). Section 5.2.2 requires the TQR to contain the General Technical Base (Section 1); the Functional Area Qualification Standard (Section 2); Site, Facility, and Position-Specific Standards (Section 3); and, the final qualification page. Further, section 5.4.2 requires that before completing final qualification activities, all competencies in the General Technical Base, Functional Area, and Site, Facility, and Position-Specific Qualification Standard(s) must be completed and signed by a designated QO. DOE Order 226.1, page 4, paragraph b(2)(d) requires qualification to be tailored to work activities. The program must clearly identify unique Department and position-specific work activities and the knowledge and skills necessary to accomplish the work. A process must be developed to determine needed additional office, site, facility, and position-specific technical competencies for the individual positions. DOE Order 426.1, page 6, paragraph (4) requires each organizational element to use FAQs or other appropriate means to document technical qualification requirements for the position. These requirements must be established using the systematic approach to training methodology. If Federal personnel are expected to have knowledge, skills, or abilities not covered in FAQs, an appropriate process detailed in implementing procedures will require appropriately trained and qualified individuals (in the systematic approach to training) to develop knowledge, skill, and ability competencies and implement an appropriate office, site, facility, or position specific qualification standard. There are insufficient “systematic approach to training” qualified personnel available at DOE-SR to implement this program. There are two individuals at DOE-SR that are qualified to the Technical Training Specialist FAQs and both have significant assigned duties that would preclude them (the part time TQP Manager and another individual with contractor training oversight and quality assurance responsibilities) from accomplishing this work. See also the discussion under TQP-4 with regard for the need for additional personnel trained and qualified in the systematic approach to training. (See Deficiency TQP-2-D1)

Deficiency:

TQP-2-D1 Some DOE-SR organizations (i.e., Performance Assurance Division, Technical Support Division, etc.) appear to need, but do not have, organizational, facility, or position specific qualification standards in accordance with DOE Order 426.1 and SRM 300.1.1B.

Conclusion:

Having identified needs for office specific qualification standards, and not fully implementing a site, office, facility, and position-specific qualification standard process (that is required by source and implementing directives) leads the Team to conclude that the TQP-2 criteria were partially, but not fully met.

TQP-3, Plans and Procedures. Plans and/or procedures are developed and implemented to govern administration of the program.

Criteria:

- 3.1 Senior management is committed to the TQP.
- 3.2 Written procedures that adequately define the processes and requirements to implement the TQP are in place.
- 3.3 Roles and responsibilities for implementing the TQP are clearly defined and understood by all involved.
- 3.4 The procedures that govern implementation of the TQP are understood by all involved and are being implemented as written.
- 3.5 A training and qualification records system is established for each employee in the TQP.

Assessment Results:

DOE-SR management has not clearly communicated expectations for a compliant and effective Technical Qualification Program (TQP) and has not ensured sufficient resources are applied to manage and administer the TQP. There is substantial frustration among the managers interviewed with the current situation they find themselves in, where the staffing and program direction funding sometimes forces less than optimal decisions on what is viewed as being competing priorities (e.g., mission is why we are here, the work must be done safely, given that I have hired good people that are well experienced, sometimes meeting training and qualification dates will need to wait until I am on firm ground with regard to safe mission accomplishment). Failure to meet requirements associated with mission accomplishment is sometimes viewed as more important than meeting TQP requirements. As evidence, senior managers and their subordinates often exceed required qualification dates without taking required actions detailed in the implementing procedure (i.e., extensions, negative personnel

actions, etc.). In most cases the reason cited for exceeding qualification dates was due to their assigned workload. (See Deficiency TQP-3-D1)

During manager interviews, a couple of managers mentioned that the current staffing ceilings and critical hire situation made succession planning difficult or impractical. One manager advised that given the current staffing situation; the number of technical and professional personnel already eligible for retirement or that will soon be eligible for retirement; and, the time that it takes to get even good people through qualification, that there should be a hundred or more FTEs authorized to fill a technical qualification pipeline to have a chance at keeping ahead of attrition (such as that being accomplished within the contractor operator training program at Liquid Waste Project). This is especially true given the incentivized (\$25K) voluntary early retirement program authorized for EM in FY2011 where DOE-SR may not be able to protect or make certain critical positions ineligible (i.e., Facility Representatives, Facility Engineers, Safety System Oversight, Fire Protection Engineers, Criticality Safety, etc.) (See Deficiency TQP-3-D1)

The TQP Manager spends about 20% of his available time on the TQP, and about 80% in support of the Office of Human Capital Management (OHCM). The TQP Manager is not an engineer, has extensive military training experience, participates in the TQP, and is qualified to the Technical Training Specialist FAQs (one of two people at DOE-SR). He often serves in an acting capacity for the Director of OHCM. The TQP Manager is also responsible for the updating of the OHCM's weekly report (contains both TQP and OHCM data elements) and does so with the assistance of a part time support service contractor that supports both TQP and OHCM efforts. Recently, the TQP Manager has attempted to spend two days a week at H-Area to be closer to the FTCP Agent and to concentrate efforts those days on the TQP. It is important to note that federal training was previously supported by as many as four or five administrative personnel to maintain training records; develop office, facility, and position-specific qualification standards; develop and present group and continuing training; and, other administrative duties associated with federal training, as well as the TQP. (See Deficiency TQP-3-D1)

The FTCP Agent at DOE-SR is not a Senior Executive Service member, and does not have a seat on the DOE-SR Executive Board. The DOE-SR TQP lacks an effective champion to ensure a compliant and effective TQP that fully supports mission accomplishment. DOE Order 426.1, page 12, paragraph (10) requires the Field Element Manager (FEM) to appoint a FTCP Agent, who is qualified as an STSM and has ready access to and/or authority to deploy resources for the FEM. The FTCP Agent responsibility has been assigned to a highly qualified individual, with significant training and qualification experience (as a collateral duty). His "day job" is as the division director of a technical division under the AM for the Waste Disposition Project. Historically, and across the DOE Complex most, if not all FTCP Agents are at the Deputy Manager or Assistant Manager (Senior Executive Service) level and have a seat at the table and a voice in the executive management of their organizations. At DOE-SR the prior Deputy Manager for Cleanup was the FTCP Agent (and a strong champion of the TQP), with the

person who is now the Agent as a backup Agent. The present FTCP Agent does not have an assigned seat on the DOE-SR Executive Board. During the conduct of management interviews, some frustration was expressed with a junior person (the current FTCP Agent is junior to Assistant Managers and the Office Directors) approving or disapproving extension/suspension requests, and for approval of who could be on the Qualifying Official list. (See Deficiency TQP-3-D2)

A non-technical individual is being assigned to a TQP Manager Position Description without being required to participate in the TQP or qualify to the Technical Training Specialist functional area qualification standard. The FTCP Agent has arranged for a Program Analyst, a GS-0343 to be reassigned to AMWDP, Waste Disposition Engineering Division to a position description that, among other things 1) requires the incumbent to perform or coordinate self-assessments of the TQP; 2) reviews the adequacy of the of DOE-SR TQP Federal Training Programs through formal audits, appraisals, or document reviews; and, 3) exercises administrative oversight for FAQs, TQP, and FTCP. The position does not require participation in the TQP and does not require this individual to qualify to the Technical Training Specialist FAQs. During an interview of the FTCP Agent, the Agent advised his plan was for this individual to eventually assume the TQP Manager position. He also advised that the program analyst had no previous training or qualification experience. The most successful TQP managers in the complex have a technical background that supports qualification as a Technical Training Specialist (e.g., strong TQPs at Y-12 Site Office and the Idaho Operations Offices are led by TQP Managers that are trained and experienced engineers, with strong previous experience in training and qualification programs, and are qualified to the Technical Training Specialist FAQs). (See Observation TQP-3-O1)

Some previously identified deficiencies, observations and opportunities for improvement from previous assessments, were not handled in accordance with the requirements of SRM 226.1.1C, *Integrated Performance Assurance Manual*. Numerous issues have been identified by this team and by previous internal and external independent assessments. Some of the issues identified by this Team are repeats of issues identified during previous assessments. One problem noted was that the majority of the deficiencies were identified as issues, recommendations or opportunities for improvement, but management did not direct adequate causal analysis, did not drive the creation of formal corrective action plans, and did not enter those corrective actions into a corrective action tracking system. No corrective actions entered into SIMTAS meant the identified issues were not fully addressed (some informal corrective actions led to a few program improvements) and may not have been thoroughly briefed to senior management. (See Deficiency TQP-3-D3)

DOE-SR implementing procedures are inadequate and this has resulted in 1) a lack of clear understanding of assigned roles and responsibilities; and, 2) the inability to fully demonstrate compliance with or demonstrate an appropriate flow down of directive requirements. Implementing procedures have exceeded (by years) the required review/revision

frequency defined in the DOE-SR implementing procedure (SRIP 200, Chapter 251.4, Section 5.5) for the upkeep of directives, do not reflect the current organization (e.g., HRMDD versus OHCM), and are not in accordance with the current processes used today to manage and administer the program. Specific deficiencies are described below. (See Deficiency TQP-3-D4)

The process for gathering monthly stoplight chart data, for producing the report, or distribution is not described in the SRM-300.1.1B. During interviews, DOE-SR managers and training liaisons (TLs) indicated that this process provided highly useful data and has had a positive impact on qualification progress. This process is described in the draft revision to SRM 300.1.1B but was informally implemented in advance of the approval of the directive. (See Deficiency TQP-3-D4)

DOE Order 426.1, page 8, paragraph (f) requires that Field Element Managers or designees must develop formal guidance for walk-through and oral examinations that includes standards for qualification, use of technical advisors by a board, questioning procedures or protocol, pass/fail criteria, board deliberation and voting authorization procedures, and for the documentation process. DOE P 450.4, Safety Management System Policy, page 2, states “Competence Commensurate with Responsibilities. Personnel shall possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities.” There is an inadequate description and sometimes contradictory requirements for the retention of documentation in SRM 300.1.1B. In any event, the implementing procedure must describe expectations with regard to the documentation of walk-throughs and oral checkouts and examinations, sufficient to establish a documented basis for the qualification that ensures competence commensurate with responsibilities. (See Deficiency TQP-3-D4)

DOE Order 426.1, page 6, paragraph (4) requires that technical qualification requirements must be established using the systematic approach to training methodology. FR requalification is accomplished in accordance with SRM 300.1.1B, Section 6.1, paragraph 5.8. This section is silent on who develops, reviews, or approves the delta qualification card and is silent on requiring development or review by an appropriately qualified individual in accordance with the order requirement. Additionally, a review of FR records shows numerous deficiencies in their official training records at OHCM (i.e., missing TQRs, missing final examination, oral board, oral examination/checkout documentation, etc.). DOE Order 426.1, page 6, paragraph (m) requires the TQP plan/procedure must include processes and requirements for maintaining training and qualification records. (See Deficiency TQP-3-D4)

DOE-STD-1063-2006, Facility Representatives, provides guidance that the FEM is to provide specific requirements related to FR proficiency. Specifically, “Field Element Managers shall formally define proficiency requirements. These requirements shall include actions required to regain proficiency following periods of inactivity as a Facility Representative, and the length of time which triggers a need for proficiency training.” Detailed specific proficiency requirements are not found in SRM 300.1.1B. (See Deficiency TQP-3-D4)

When delta qualification cards are developed for the requalification of STSMs (not covered by SRM 300.1.1B), a process described in DOE-STD-1175-2006, *STSM Functional Area Qualification Standard* is used. A self evaluation by the specific STSM is conducted against the competencies in the qualification standard to identify which competencies have been exercised

and for which the member believes he/she has remained proficient. A delta qualification card is prepared that captures those areas where proficiency was reported not to of been maintained, and captures changes (including mandatory performance factors) from the qualification standards (GTB, FAQs, and site/facility/organizational specific) used for initial qualification. It is not clear when this delta qualification card is to be initiated or issued and this has led to confusion and exceeding required (5 year) re-qualification dates for senior personnel at DOE-SR. The TQP Manager reported that a decision had been made recently to initiate the delta qualification definition process one year in advance of the required five year requalification date (not formally captured in the implementation procedure). This would allow sufficient time to develop, review, and approve the delta qualification card and then allow adequate time to complete the card and satisfactorily complete final qualification examination. This process, along with specific direction on documentation expectations and retention expectations needs to be captured in the new implementing procedure. Additionally, it is not clear who is 1) to develop, review, or approve the delta qualification card and TQR prior to issuance; and, 2) how the requirement for the involvement of “systematic approach to training” personnel is met. (See Deficiency TQP-3-D4)

The qualifying official process has changed significantly from the process described in SRM 300.1.1B, Section 6.1, paragraph 5.13. The process described in the draft revision to the SRM 300.1.1B has been informally implemented (prior to the approval of the draft revision described process). SRM 300.1.1B, section 5.13 says nothing about a QO database or the administration of that database. Roles and responsibilities associated with maintenance of the system and approval of additions and deletions of QOs are not codified or understood (i.e., the FTCP Agent currently approves who is an authorized QO and controls updates to the QO database). During the course of interviews with senior managers, frustration was expressed at their removal from the QO list and for the difficulty in getting in to see and receive oral examinations with too few individuals on the list for some competencies. Additionally they said that some of those on the QO list are heavily burdened individuals and it was difficult to get time on their calendars for an oral checkouts or examinations. Furthermore, some senior managers who were previously qualifying officials (with rich technical qualification backgrounds) were removed from the QO list and are no longer able to sign technical qualification cards of their staff, even if they felt comfortable with the subject area. (See Deficiency TQP-3-D4)

DOE Order 426.1, page 4, paragraph b. (2) states “Each Headquarters and field element with defense nuclear facilities responsibility must establish a TQP for its organization. Although the programs may be designed to meet the unique needs and responsibilities of each organization, the following principles must be used as the basis for all TQPs.” Paragraph (2) (a)-(c) are as follows:

- (a) Demonstration of Competence. The program must clearly identify and document the process used to demonstrate employee technical competence (e.g., professional certifications, qualification cards, background, and experience).
- (b) Competency Levels. The competency levels within the program must be clearly defined and consistent with applicable industry standards for similar occupations.
- (c) Plans and Procedures. Plans and procedures must be developed and implemented to govern the administration of the program.

DOE P 450.4, Safety Management System Policy, page 2, Component 2, *Guiding Principles for Integrated Safety Management*, states “The guiding principles are the fundamental policies that guide Department and contractor actions, from development of safety directives to performance of work.” And, “Clear Roles and Responsibilities. Clear and unambiguous lines of authority and responsibility for ensuring safety shall be established and maintained at all organizational levels within the Department and its contractors.” Roles, responsibilities and authorities for Training Liaisons (TLs) are not defined in SRM-300.1.1B. Implementation across DOE-SR is inconsistent (e.g., most directorates have liaisons, some do not; in some DOE-SR directorates the training liaisons assist in the development of Technical Qualification Records, others do not; and, some TLs actively participate in examination preparation). This process is inadequately described (not sufficient to provide a clear understanding of roles, responsibilities, or authorities) in the draft revision to SRM 300.1.1B, but was informally implemented in advance of the approval of the directive. (See Deficiency TQP-3-D4)

A new FR qualification process has been put in place without appropriate expertise being applied. The Site Office Manager has not been briefed on the AMWDP Interim/Duty Officer FR Qualification Standard and the qualification standard was not developed or reviewed by a person trained or qualified in the systematic approach to training as required by DOE Order 426.1. During the course of interviews it was learned that AMWDP is in the process of developing and implementing a new qualification standard for a duty officer program that will allow some relief to a Facility Representative shortage in the project (4 fully qualified FRs against an analyzed need of 12). The net result of the new process will be fewer qualified FRs on duty at AMWDP on backshifts. Furthermore, given the statement by the AMWDP Operations Division Director that some “prioritization” of the annual assessment plan had occurred implies some reduction in the planned FR oversight. Short staff, reductions in the on-call FRs within the facilities, with some prioritization of planned oversight suggests that review and concurrence by the risk accepting official, the Site Office Manager is appropriate. Furthermore, it is not clear that a person skilled or qualified in the systematic approach to training [as required by DOE Order 426.1, page 6, paragraph (4)] developed, or reviewed the new qualification standard. (See Deficiency TQP-3-D5)

Since November 19, 2009 eight senior DOE-SR managers have initially qualified to the Senior Technical Safety Manager (STSM) Functional Area Qualification Standard without completing a comprehensive written examination. DOE Order 426.1 requires the comprehensive written examination for initial STSM qualification and this order was issued November 19, 2009. Others at DOE-SR are currently completing the STSM initial qualification without the requirement to complete a comprehensive written examination. DOE O 426.1, page 9, paragraph (6) (b) requires final initial qualification of STSMs must be performed through satisfactory completion of a comprehensive written examination with a minimum passing score of 80 percent; and, 1) the satisfactory completion of an oral examination by a qualified STSM or a qualification board of technically qualified personnel that includes at least one STSM; or, 2) satisfactory completion of a walk-through of a facility with a qualifying official for verifying a candidate’s knowledge of and practical skills related to selected key elements. Currently, STSMs are initially qualified at DOE-SR without completion of the comprehensive examination. When DOE Order 426.1 was issued in November 2009 there were eight or more DOE-SR managers qualifying to the previous standard (no written comprehensive

examination required). The FTCP Agent reported that he had decided not to impose the requirement, because it was not in their original TQR. This seems inconsistent given the fact that several processes important to the administration of the TQP (e.g., stoplight reporting process, training liaison process, qualifying official process, etc.) that are described in the revision to the implementing procedure, were implemented informally prior to approval of the same procedure. The draft revision has been “in process” for over two years. There was no formal documentation of the decision or concurrence on the decision that is available. This has resulted in a situation where senior DOE-SR managers may have inadequate documentation of the basis for their STSM qualification in accordance with the order. Several have qualified at a point greater than six months after the issuance of the new order. Still others are currently in the qualification to TQRs that do not reflect the change in requirement. The current implementing document, SRM 300.1.1B, section 5.3.18 states “In the event a revision is made to a particular qualification standard while a TQP participant is in the process of completing his/her qualification, the supervisor and the participant will determine whether to continue with the current standard or incorporate changes from the revised standard.” There is no evidence in training records, or that was discussed during interviews that indicate that this step was accomplished and documented by any of the affected individuals or their supervisors. (See Deficiency TQP-3-D6)

DOE-SR managers are not enforcing the requirements in source or implementing directives for personnel who fail to meet assigned qualification dates. DOE Order 426.1, page 9, paragraph 6.(c) requires “Maintenance of Qualifications. FEMs must require personnel filling STSM positions to re-qualify to the latest version of the STSM FAQs every five (5) years. The requalification period for FRs is addressed in DOE-STD-1063-2006, *Facility Representatives*. Personnel who fail to complete the identified requalification requirements by the end of the requalification period may be granted a six month extension for requalification by the respective FEM, provided that compensatory measures are identified and implemented to allow them to continue to perform their duties safely. If the requalification requirements are not completed within the six month extension, such personnel must be removed by the respective FEM from duties requiring qualification.” This is not in accordance with the current implementing procedure or practice at DOE-SR. SRM 300.1.1B, Section 6.1, paragraph 4.2.15 defines an extension as a one-time event of up to six months as approved by the Deputy Manager or the FTCP Agent. For other qualifications, extensions are requested by the AM/OD and are forwarded to HRMDD (now OHCM). Currently, the supervisor fills out an extension request form, the AM/OD concurs, and it is approved by the FTCP Agent. Over the last year, several DOE-SR managers have exceeded qualification dates for qualification or re-qualification to the STSM FAQs. In each of the recent cases the six month extension discussed in DOE Order 426.1 and as required by SRM 300.1.1B, pages 13-14, paragraphs 5.3.14 – 5.3.17 was not routed for approval. SRM 300.1.1B, page 10, paragraph 5.1.5 states that personnel who fail to qualify or re-qualify within authorized time limits are subject to disciplinary action up to and including termination or involuntary placement in a non-TQP position at the same or lower grade. Besides managers missing qualification dates, there are a number of examples where more junior personnel failed to meet qualification dates, some with and some without extensions, some by up to a half a year or more without disciplinary action. (See Deficiency TQP-3-D7)

A TQP Manager or FTCP Agent self-assessment of the examination bank process in place at DOE-SR should be scheduled when possible. There are a number of improvements that may be considered with respect to the examination bank process as described in SRM 300.1.1B, page 14-15, section 5.4.5. There was a view expressed during the Training Liaison interviews that the examination banks needed to be updated and configuration controls needed to be applied to the examination banks. The need for configuration management on examination banks refers to ensuring that there were sufficient differences between examination used for initial qualification and re-qualification to ensure some different subject areas are tested or sufficient differences from one person's comprehensive examination to another's to prevent anticipation of examination contents. The current way that examinations are prepared was described as, after the need for an examination was identified, questions from the examination bank were selected and then were reviewed for the need for updating by a qualified person, prior to issuance of the particular examination. Little was being done with regard to the writing of new questions to improve the overall quality of the examination bank or maintain bulk examination questions current. The exam banks should be reviewed for currency and configuration control issues. With respect to the actual examination process, only one individual grades the exam. This may be an acceptable practice when it is clear that the individual has passed with a high score. A common practice in the commercial nuclear sector is to have the exam graded by at least two individuals without any consultation. This practice minimizes any individual or knowledge bias that may exist. Due to a shortage of available field time, the Team was unable to follow-up on comments provided by the Training Liaisons, but there appears to be enough information here that warrants a TQP surveillance, self-assessment, or audit. (See Observation TQP-3-O2)

A memorandum of agreement (MOA) between DOE-SR and ETS at Albuquerque for work expectations for an ETS employee stationed at DOE-SR is needed. The MOA should support a clear understanding of assigned roles, responsibilities, and authorities. An ETS employee stationed at DOE-SR is working on continuing training; announcement of group training opportunities; files TQP documentation is the official training records; and, on generation of required annual reports associated with training needs analysis, and training plans and is doing so without a memorandum of agreement between ETS in Albuquerque and DOE-SR. A meeting at DOE-SR to work out a memorandum of agreement was cancelled last year by DOE-SR and has not been re-scheduled. A position description for her position was not made available after being requested by the Team. There appears to be a sense of disagreement over expectations for this individual's work at DOE-SR. A memorandum of agreement needs to be worked out between the two organizations to ensure a clear understanding of roles, responsibilities and authorities. (See Observation TQP-3-O3)

SRM 300.1.1B definition of technical training record documentation and retention requirements are inadequate to support an adequate flow-down of DOE Order 426.1 training record requirements; to form the bases for technical qualifications by some DOE-SR technical personnel; to ensure the appropriate transportability of qualifications achieved by DOE-SR technical personnel; to define a process for maintaining the training records; or, to support a clear understanding of roles, responsibilities, and authorities of training staff in support of this system of records. Centralized monitoring and record keeping for all TQP elements was identified as an area needing improvement in the TQP Pre-Accreditation Review in January 2008. A review of formal training records was conducted. These records are the ones needed to ensure the appropriate transportability of qualifications

obtained by individuals qualified at a field organization to support transfers of personnel from one job assignment to the next, from one organization to the next, and finally to allow qualified individuals to move to other positions within the DOE complex and be able to take credit for prior qualifications. That presumes that an effective program is in place to capture needed documentation and then to maintain it. The sample selected included fifteen TQP files for DOE-SR personnel, with senior managers {with Senior Technical Safety Manager (STSM) responsibilities}, Facility Representatives (FRs) and personnel with Nuclear Safety Specialists with Safety System Oversight (SSO) collateral assignments. All records reviewed had identifiable deficiencies and the overall condition of the records were not much different than during a similar review that was conducted by the Office of Independent Oversight during an inspection of DOE-SR in August 2009. Although the issue of inadequate formal training documentation was raised during the August 2009 review, no audit or self-assessment activity has been performed in the interim. Formal training records are often missing documentation such as TQRs for current and former TQP functional area qualifications, facility walkthroughs, oral boards, oral interviews, or cover sheets of written examinations, extension letter, continuing training/proficiency maintenance evidence, etc. An additional review of selected FR records was conducted principally to ascertain the competencies contained in the site process for "Interim" or "Duty Officer" qualification. No "Interim" or "Duty Officer" qualification records were found in the central vault location. Subsequent review did locate these records at AMWDP. SRM 300.1.1B allows the facility to maintain some FR training records at the site, but assigned TQRs, completed TQRs, examination cover sheets, and board sheets are to be sent to the formal training record at the Office of Human Capital Management, to the TQP Manager. Further, during entry to the vault for the additional FR record review, the vault door was found to be unlocked and the records were stored in the vault in unlocked filing cabinets. This is contrary to SRM 300.1.1B requirements for the storage of TQP records. (See Deficiency TQP-3-D8)

Detailed documentation of oral examinations and facility walk-throughs in the AMWDP Operations Division are appropriate and exceed expectations provided in SRM 300.1.1B. The Team considered this to be a good practice and it is one the rest of DOE-SR should emulate. With regard to adequate documentation of oral examination results, the operations division documents (in detail) records of walkthroughs and oral examinations. These records appeared to accurately reflect the various best practices, including all questions and answers for the oral examinations and facility walkthroughs. (See Good Practice TQP-3-GP1)

Deficiencies:

- TQP-3-D1 DOE-SR senior management has not clearly communicated expectations for a compliant and effective Technical Qualification Program (TQP) and has not ensured sufficient resources are applied to manage and administer the TQP.
- TQP-3-D2 The FTCP Agent at DOE-SR is not a Senior Executive Service member, and does not have a seat on the DOE-SR Executive Board. The DOE-SR TQP lacks an effective champion to ensure a compliant and effective TQP that fully supports mission accomplishment.

- TQP-3-D3 Some previously identified deficiencies, observations and opportunities for improvement from previous assessments, were not handled in accordance with the requirements of SRM 226.1.1C, *Integrated Performance Assurance Manual*.
- TQP-3-D4 DOE-SR implementing procedures are inadequate and this has resulted in 1) a lack of clear understanding of assigned roles and responsibilities; and, 2) the inability to fully demonstrate compliance with, or demonstrate an appropriate flow down of directive requirements.
- TQP-3-D5 A new FR qualification process has been put in place without appropriate expertise being applied. The Site Office Manager has not been briefed on the AMWDP Interim/Duty Officer FR Qualification Standard and the qualification standard was not developed or reviewed by a person trained or qualified in the systematic approach to training as required by DOE Order 426.1.
- TQP-3-D6 Since November 19, 2009 eight senior DOE-SR managers have initially qualified to the Senior Technical Safety Manager (STSM) Functional Area Qualification Standard without completing a comprehensive written examination. DOE Order 426.1 now requires the comprehensive written examination for initial STSM qualification and this order was issued November 19, 2009. Others at DOE-SR are currently completing the STSM initial qualification without the requirement to complete a comprehensive written examination.
- TQP-3-D7 DOE-SR managers are not enforcing the requirements in source or implementing directives for personnel who fail to meet assigned qualification dates.
- TQP-3-D8 SRM 300.1.1B definition of technical training record documentation and retention requirements are inadequate to support an adequate flow-down of DOE Order 426.1 training record requirements; to form the bases for technical qualifications by some DOE-SR technical personnel; to ensure the appropriate transportability of qualifications achieved by DOE-SR technical personnel; to define a process for maintaining the training records; or, to support a clear understanding of roles, responsibilities, and authorities of training staff in support of this system of records.

Observations:

- TQP-3-O1 A non-technical individual is being assigned to the TQP Manager Position Description without being required to participate in the TQP or qualify to the Technical Training Specialist functional area qualification standard.
- TQP-3-O2 A TQP Manager or FTCP Agent self-assessment of the examination bank process in place at DOE-SR should be scheduled when possible.

TQP-3-O3 A memorandum of agreement (MOA) between DOE-SR and ETS at Albuquerque for work expectations for an ETS employee stationed at DOE-SR is needed. The MOA should support a clear understanding of assigned roles, responsibilities, and authorities.

Good Practice:

TQP-3-GP1 Detailed documentation of oral examinations and facility walk-throughs in AMWDP Operations Division are appropriate and exceed expectations provided in SRM 300.1.1B. The Team considered this to be a good practice and it is one the rest of DOE-SR should emulate.

Conclusion:

Less than adequate management commitment to the TQP; the lack of a senior management champion of the TQP at an appropriate level in the organization; inadequate resources provided to manage and administer the program; inadequate implementing procedures to demonstrate compliance with or demonstrate an appropriate flow down of directive requirements; inadequate training and qualifications records to form the bases for technical qualifications and to ensure the appropriate transportability of qualifications completed by technical personnel; and, managers not enforcing the requirements in implementing directives for personnel who fail to meet assigned qualification dates leads the Team to conclude that the TQP-3 criteria were partially, but not fully met.

TQP-4, Qualification Tailored to Work Activities. The program identifies unique Department- and position-specific work activities and specifies the knowledge and skills necessary to accomplish that work.

Criteria:

- 4.1 An analysis has been performed to identify the related knowledge, skill, and ability elements to accomplish the duties and responsibilities for each TQP functional area or position.
- 4.2 The program includes job-specific requirements related to the rules, regulations, codes, standards, and guides necessary to carry out the mission of the office.
- 4.2 The program supports the mission needs of the office.

Assessment Results:

The analysis of knowledge, skill, and abilities (KSAs) has been accomplished with regard to the preparation of the Functional Area Qualification Standards that are prepared and approved by the Federal Technical Capability Program (FTCP) for use across the DOE complex. DOE Order 226.1, page 4, paragraph b.(2)(d) requires “Qualification Tailored to Work Activities. The program must clearly identify unique Department and position-specific work activities and the knowledge and skills necessary to accomplish the work. A process must be developed to determine needed additional office/site/facility specific technical competencies for the individual positions.” Page 6, paragraph (4) requires each organizational element to use FAQs or other appropriate means to document technical qualification requirements for the position. These requirements must be established using the systematic approach to training methodology. DOE-SR does not have sufficient personnel qualified the Technical Training Specialist FAQs (skilled in the systematic approach to training) to produce and maintain office/site/facility or position-specific qualifications standards (see discussion associated with TQP-2-D1)

In order to support mission needs, the TQP must be able to demonstrate that DOE-SR technical personnel have competence commensurate with responsibilities. Given the current state of the official training and qualifications records at DOE-SR (see discussion associated with TQP-3-D8) and the lack of appropriate office, site, facility, or position-specific qualification standards (see discussion associated with TQP-2-D1) the DOE-SR TQP does not adequately support mission needs.

Deficiencies:

See Deficiencies TQP-2-D1, and TQP-3-D8.

Overall:

The current state of the official training and qualifications records and the lack of appropriate office, site, facility, or position specific qualification standards leads the Team to conclude that the TQP-4 criteria were partially, but not fully met.

TQP-5, Credit for Existing TQPs. The program is structured to allow credit, where appropriate, for other TQP accomplishments.

Criteria:

- 5.1 Credit (equivalency) is granted for previous training, education, experience, and completion of related qualification/accreditation programs, where applicable.
- 5.2 Equivalency is granted based upon a review and verification of objective evidence, such as transcripts, course certificates, test scores, or on-the-job experience.
- 5.3 Equivalencies are formally validated, approved, and documented.

Assessment Results:

Credit (equivalency) is not routinely granted for previous training, education, experience, and completion of related qualification/accreditation programs, where applicable. SRM 300.1.1B, Section 6.1, paragraph 5.3.5 says that equivalencies are not recommended for completing competencies. DOE O 426.1, page 7, paragraph (5)(d) states that equivalencies may be granted to employees who satisfy competencies indicated in FAQs. Equivalencies must be based upon objective evidence of previous education, training, certification, or experience. Objective evidence includes any combination of transcripts, certifications, and, in some cases, a knowledge sampling demonstrated through a written and/or oral examination. Equivalencies should be used with the utmost rigor and scrutiny to maintain the spirit and intent of the TQP. During the course of manager interviews, frustration was expressed several times relative to the difficulty associated with documentation and approval requirements for equivalencies for DOE-SR competencies.

The Team was unable to locate any recent examples where equivalencies were granted for technical competencies and so were unable to verify performance in accordance with criteria 5.2 or 5.3.

The management decision to not encourage equivalencies, but to require questioning by an appropriate Qualifying Officials is more conservative than the criteria associated with this CRAD.

Observation:

TQP-5-O1 Credit (equivalency) is not routinely granted for previous training, education, experience, and completion of related qualification/accreditation programs, where applicable.