

## **CRITICALITY SAFETY (CS)**

### **OBJECTIVE**

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

### **CRITERIA**

1. The Site Office has developed and implemented processes and procedures to effectively oversee contractor performance in this functional area (DOE O 226.1A; NA-1 SD 226.1A)
2. The Site Contractor has prepared and submitted a CSP description document that has been approved by the Site Office Manager or designee. The CSP description document is current and consistent with the commitments in the applicable documented safety analysis (DSA) (DOE O 422.1; NA-1 SD 411.1-1C).
3. Site Office procedures and mechanisms ensure that the Site Contractor has prepared implementing mechanisms for the CSP that meet the requirements of DOE O 420.1B and the commitments in each DSA and Technical Safety Requirement (TSR) (10 CFR Part 830; DOE O 420.1B; DOE O 226.1A; NA-1 SD 226.1A).
4. Site Office procedures and mechanisms ensure that nuclear facility operations covered by the CSP are conducted in accordance with CSP implementing mechanisms requirements (10 CFR Part 830; DOE O 420.1B; DOE O 226.1A; NA-1 SD 226.1A).
5. Site Office procedures and mechanisms ensure that the Site Contractor has conducted periodic assessments that provide confidence that the CSP is effectively implemented in all nuclear facilities (DOE O 226.1A; NA-1 SD 226.1A; DOE O 420.1B).
6. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-assessments) have been appropriately resolved, corrective actions have been completed and are adequate, or a clear path to completion is indicated (DOE O 226.1A; NA-1 SD 226.1A).
7. The Site Office has sufficient staff, and assigned personnel have adequate technical competence, to oversee the performance of the contractor's CSP (NA-1 SD 411.1-1C).

### **APPROACH**

References:

- 10 CFR Part 830, *Nuclear Safety Management*
- DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*
- DOE O 420.1B, *Facility Safety*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM)*
- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*

Record Review:

- Review site contract List A/B and Standards/Requirements Identification Documents (S/RIDs) or Work Smart Standards (WSSs). Review DSAs and TSRs for selected nuclear facilities.
- Review Site Office procedures and organizational information to evaluate CSP approval process and oversight of the contractor's CSP.
- Review NNSA Site Office assessments and operational awareness information concerning the contractor CSP.

Interviews:

- Interview Site Office facility representatives (FRs) and Site Office staff responsible for CSP documentation approval and CSP oversight.

Observations:

- Site Office oversight activities and facility walkdowns with staff personnel responsible for CSP oversight and FRs focusing on criticality safety postings; and criticality safety engineer implementation activities.