

Office of Environment, Safety, and Health Assessments

Protocol for Oversight Activities



December 2015

**Office of Enterprise Assessments
U.S. Department of Energy**

**Office of Environment, Safety, and
Health Assessments**

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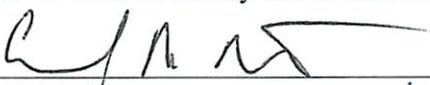
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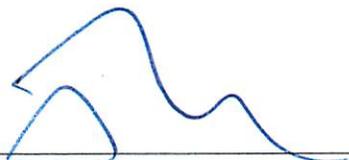
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Table of Contents

1.0	Purpose.....	1
2.0	Applicability	1
3.0	Requirements	1
4.0	Responsibilities.....	4
5.0	References.....	6
6.0	Appendices.....	7
APPENDIX A: Small Team Oversight Activities and Schedule		A-1
APPENDIX B: Types of Reviews.....		B-1

1.0 PURPOSE

The purpose of this protocol is to establish the requirements and responsibilities for conducting and managing an Office of Environment, Safety and Health Assessments (EA-30) oversight activities. These activities are the primary means of gathering independent performance data to support the independent assessment function. These oversight activities include assessments of select technical areas and operations, concurrent assessments with line management activities, observation of selected site meetings and operational safety-related activities, and reviews directed by the Secretary or requested by Department line management. This protocol further discusses and categorizes these activities as assessment and operational awareness activities.

2.0 APPLICABILITY

This protocol is applicable to assessment and operational awareness activities conducted by the Office of Environment, Safety, and Health Assessments. These oversight activities are typically performed by no more than four individuals. Assessments that are larger in scope, complexity, or manning may warrant additional supervision or advisory personnel such as that discussed in the EA protocol for site appraisals.

3.0 REQUIREMENTS

General

- This protocol provides the requirements and guidance for assessment and operational awareness activities. Exceptions to the processes may be utilized for highly unique activities with approval of the Director, Office of Environment, Safety and Health Assessments.
- Office of Environment, Safety, and Health Assessments activities are to be performed in accordance with DOE Order 227.1, applicable guides, approved review plans, and criteria, review, and approach documents (CRADs).
- The selected team members must possess qualifications, competencies, and experience commensurate with their responsibilities and free of any potential conflict of interest.
- Available background information will be provided and reviewed by the assigned team members to facilitate the planning and performance of the assessment.
- Site and program security limitations regarding the use of personal electronic equipment and the requirements for site computers and local area network (LAN) access, safety and security training, and personal protective equipment (PPE) pertinent to the planned activity will be determined and followed.
- Protection requirements for classified information and controlled unclassified information (CUI) associated with the activity will also be determined and followed including reviews of the resultant reports and documentation to ensure they are appropriately marked.
- When unresolved differences occur with the scheduling of activities, the factual accuracy of the report, or comment resolution arise with the organization being reviewed, they are raised to the next level of management in accordance with DOE Order 227.1. The Department's Office of Primary Interest will be consulted concerning differences in interpretations of policy.

- Policy issues identified during oversight activities should be reported to the Department's Office of Primary Interest in the oversight activity report, operational awareness record, or a separate assessment report as determined by EA-30 management.
- The Office of Environment, Safety, and Health Assessments will retain review plans, assessment reports, field notes, operational awareness records, briefing slides, closeout summary, and comment resolution matrix supporting the accuracy of the report.
- During the staff meeting following the oversight activity, the team leader will summarize the key results from the activity and discuss lessons learned and potential process improvements for future oversight activities.

Assessments

- Assessments include targeted assessments, limited-scope assessments, and concurrent assessments with line or contractor oversight activities.
- The review plan for assessments will utilize the template and CRADs maintained on the EAShare site. Deviations from this protocol or the CRADs should be identified and justified in the review plan. The draft plan should be provided to the EA-30 Site Lead (for nuclear facilities) and DOE Site office point of contact (POC) for review and comment. The review plan will be approved by the Director of the Office of Environment, Safety, and Health, via the cognizant EA-30 director, and provided to the EA-30 Site Lead and DOE Site Office POC for information.
- The team leader should, in coordination with the Site Lead and the DOE Site Office POC, ensure the following are accomplished before arriving on site to optimize the use of time onsite:
 - documentation is provided and reviewed to the extent practical,
 - potential findings and opportunities for improvement based on initial documentation reviews are drafted for internal team discussion and validation,
 - initial lines of inquiry are developed by the team,
 - tours, interviews, and surveillances of work and training are scheduled,
 - site counterparts (subject matter experts) are identified, and
 - team workspace is reserved and site access requirements are met or required training is scheduled.

A checklist for planning activities is maintained on the EAShare site.

- The team lead will periodically brief the cognizant second tier director in EA-30, the Site Lead, the DOE Site Office POC, and the Contractor's POC on mutually agreed schedules or as needed. These communications will typically address progress in implementing the review plan, initial results, any issues that impeded the review, and any significant changes in planned activities.
 - Onsite oversight activities should begin with a formal onsite entrance meeting, proceed with daily team meetings with DOE Site Office and Contractor POCs, and conclude with a formal exit meeting for senior DOE Site Office and Contractor management. The

entrance meeting agenda will include the team lead's overview of the team's plans, team introductions, and Site updates of planned work and training for the week of the review.

- For concurrent reviews, site briefings will be coordinated with other review officials. For concurrent reviews, the team leader will ensure that interface protocols are clearly articulated for effective data gathering and communications to maintain independence and to preclude interference with the site team's activities.
- While onsite, team members should discuss daily with subject matter experts and their POCs at the Site the scope and significance of the deficiencies and data/observations of the team member.
- At the exit meeting with senior DOE Site and Contractor managers, the team leader will summarize the scope of the review and the team's overall preliminary assessment results (focused on positive observations, significant potential findings and opportunities for improvement). Concluding statements should present the schedule for the factual accuracy review and resolution of comments from the site on the pending report. A closeout summary of the key results, reviewed by EA-30 management, should be provided to the senior DOE Site and Contractor managers at the exit meeting. A template to use for this summary is maintained on the EAShare site.
- The results of the assessment will be documented in a report issued by the Director, Office of Enterprise Assessments to the DOE site office manager. The report development process will ensure that the DOE Site Office and Site Contractor are provided an opportunity to verify the factual accuracy of the report, completion of the Enterprise Assessments (EA) Quality Review Board (QRB), comment resolution, and Director, Office of Enterprise Assessments approval of the report following DOE management review per the EA Correspondence Tracking (EACT) process. Templates for oversight reports are maintained on the EAShare site.
- Findings identified during oversight activities should be categorized consistent with the DOE Order 227.1.
- A draft of the report will be provided to EA-30 management for review before being forwarded to the DOE Site Office POC for factual accuracy review. Comments from the DOE Site Office will be tracked in a comment resolution matrix. A template for the comment resolution matrix is maintained on the EAShare site.
- The team leader, with the administrative staff, will arrange for an appropriate technical and management review of the draft report by a QRB.
- Upon resolution of the DOE headquarters line management factual accuracy comments (if any), the report is finalized.
- A copy of the final report will be provided to the associated DOE line organization as an attachment to a transmittal memorandum from the Director, Office of Environment, Safety, and Health. The line management organization is responsible for evaluating, addressing, and following-up on the results in accordance with the DOE line organization issues management procedures and DOE Order 227.1.

Operational Awareness Activities

- Operational awareness activities are site visits typically conducted to obtain insights into site operations and activities, to follow up on site issues, to tour facilities, or to attend key meetings.
- Opportunities for site operational awareness activities are typically identified by Site Leads but may also be identified by other EA-30 staff.
- The scope and duration of site visits for operational awareness activities should be coordinated with the DOE Site Office and EA-30 management in advance.
- An entrance brief or teleconference should be performed with the DOE Site Office POC to review the scope and schedule of the operational awareness activity and to meet onsite logistical needs (e.g., an access badge and dosimetry).
- An exit brief should be scheduled to discuss findings and opportunities for improvement with DOE Oversight Office and Contractor management. If no significant findings or opportunities for improvement are identified, the exit brief may be conducted with the DOE Site Office POC.
- Operational awareness activities will be documented in Field Notes or in Operational Awareness Records that document the activity's purpose and background and briefly summarizes the tasks performed, observations, results, and conclusions. Findings, OFIs, and other significant feedback for the Site based on an operational awareness activity should be documented in an operational awareness record from EA-30 to the DOE Site management. If there are no findings, OFIs, or significant feedback, the conduct of the operational awareness activity may be documented in a field note. The templates for Field Notes and Operational Awareness Records are maintained on the EAShare site.
- The factual accuracy of Operational Awareness Records are validated by the EA-30 technical editing resources and the DOE Site POC and entered into the Enterprise Assessment Commitment Tracking system for approval by the Director, Office of Enterprise Assessments before being posted on the Office's website.
- Field Notes are reviewed by EA-30 management and then retained on EA-30 file directories and the EAShare site.

4.0 RESPONSIBILITIES

Director, Office of Enterprise Assessments

- Approves Assessment Reports and Operational Awareness Records
- Issues correspondence to DOE Program Secretarial Officers

Deputy Director, Office of Enterprise Assessments

- Chairs Quality Review Boards

Director, Office of Environment, Safety and Health Assessments

- Approves plans for independent oversight activities.
- Approves the report transmittal memorandum and the report for delivery to the responsible DOE/National Nuclear Security Administration site manager (or designee).
- Resolve any differences regarding the schedules of activities or the resolution of issues with line management. When differences cannot be resolved, the issues need to be raised to the Director, Office of Enterprise Assessments (per DOE Order 227.1).
- Prioritizes resources for assessments, operational awareness, and other mission support activities.
- Approves CRADs.

Directors, Office of Nuclear Safety and Environmental Assessments, Office of Worker Safety and Health Assessments, and Emergency Management Assessments

- Assign appropriate technical staff to perform oversight and operational awareness activities.
- Ensure that team members possess qualifications, competencies, and experience commensurate with their assignments and are free of any potential conflict of interest.
- Review and release the draft report for transmittal to the DOE Site Office POC to initiate the DOE Site Office and Contractor factual accuracy review.
- Resolve any differences regarding schedules of activities or the resolution of issues arise with line management. When differences cannot be resolved raises them to the Director, Environment, Safety, and Health Assessments.
- Evaluate feedback and lessons learned from oversight activities for process improvements.

Site Lead

- Coordinates with the site or program office POC to facilitate the development of the site-specific review plan for small team oversight with assigned Office of Environment, Safety, and Health Assessment technical staff and subject matter experts.
- Coordinates with the DOE Site Office POC to provide assigned team members with the site and program security information and security limitations on use of personal electronic equipment, requirements for site computers and LAN access, safety and security training, and PPE, as well as available background information pertinent to the planned small team oversight or operational awareness activity.
- When items requiring follow-up are identified, monitors DOE site final resolution and disposition of report results.

Team Leader – Detailed guidance and the nominal timeline for accomplishing these responsibilities are in Appendix A.

- Acquires and disseminates background information pertinent to the oversight activity to assigned team members in support of planning that is consistent with operational and schedule constraints.
- Ensures that site and program security requirements regarding the use of personal electronic equipment, computers and LAN access, safety and security training, and PPE pertinent to the planned activity are identified and communicated to team members. Protection requirements for classified information and CUI associated with the activity will also be identified and communicated to team members.
- Leads the onsite entrance, daily, and exit meetings for the activity.
- Provides periodic status briefings to the cognizant EA-30 second tier director, Site Lead, the DOE Site Office POC, and the Contractor POC.
- Communicates major vulnerabilities or imminent danger conditions to the DOE Site Office Manager and cognizant EA Office Director (per DOE Order 227.1).
- Leads the development of the report, including the consolidation of input from other involved team members and the resolution of comments and recommendations resulting from the Site's factual accuracy and classification reviews. The team leader is responsible for the quality of the report and for staffing the report to EA-1 for approval within the goal of 60 days after the date of the closeout summary.
- Coordinate with the Deputy Director, Office of Enterprise Assessments for scheduling and conduct of QRBs.
- Participates in the QRB and resolves QRB comments.
- Drafts the Director, Office of Environment, Safety, and Health Assessments memorandum for transmittal of the report.
- When differences regarding issue resolution arise, raise to EA-30 management and the Office of Primary Interest as warranted.
- Briefs EA-30 personnel on the key results and lessons learned during the staff meeting following each oversight activity.

Team Members - Detailed guidance and the nominal timeline for accomplishing these responsibilities are in Appendix A.

- Review the provided background information to plan onsite activities and identify additional information needed for the effective performance of assigned activities.
- Comply with site and program security limitations on use of personal electronic equipment, site computer equipment and LAN access, training, and PPE, with a goal of minimizing the negative impact on the time available to perform assigned activities.
- Protect classified information and CUI.

- Provide validated input for the daily and exit meetings and the report on the overall results of the team's activities.
- Brief findings and opportunities for improvement as directed by the team leader.
- Peer review other team members work as requested by the team leader.
- Recommend initial categorization of results consistent with DOE Order 227.1 and the Site's issues management procedures as appropriate.
- Support resolution of EA-30, DOE Site Contractor, and Program Office comments and recommendations, including those resulting from the factual accuracy review.
- Provide requested follow-up support, as necessary.
- Provide the Team Leader lessons learned and potential process improvements for future assessment activities.

5.0 REFERENCES

- DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*
- DOE Order 414.1D, *Quality Assurance*
- DOE Order 227.1, *Independent Oversight Program*
- *Office of Independent Oversight Appraisal Process Protocols*, dated November 2012

6.0 APPENDICES

- A. Small Team Oversight Activities and Schedule
- B. Types of Small Team Reviews

APPENDIX A
Small Team Oversight Activities and Schedule

The purpose of this appendix is to provide the best practices used to effectively assess and document typical oversight activities in a timely manner. Team leaders should follow this guidance and timeline or proactively schedule tasks earlier or identify other mitigating actions with available resources to ensure high quality, timely, value-added assessments are performed and documented. Team leaders should report to the cognizant EA-30 director when exceptions to this guidance or timeline are needed.

Oversight Activity Planning: Thorough planning is key to obtaining and analyzing the large amounts of information from many sources needed to provide objective, timely, holistic, value-added assessments. While the level of effort needed for planning different oversight activities will vary due to the scope, depth, constraints, and/or complexity of the review, the essential elements of planning discussed below remain the same. Team members are expected to spend less than a few hours per week supporting oversight activity planning.

<p>Six to ten weeks before the oversight activity (depending on the scope, depth, constraints, and complexity)</p>	<p>The Team Leader:</p> <ul style="list-style-type: none"> ▪ contacts the affected site and organization(s) to begin ongoing coordination and development of the review plan for the oversight activity, ▪ validates the tentative scope and focus of the oversight activity (The scope and focus for the oversight activity established in the annual plan for oversight activities should be validated based on the recent performance and status of work on-site. Additionally, the team leader should offer the DOE Site Office Manager a teleconference with EA-30 management, the team leader, and the EA-30 Site Lead to discuss the scope of the oversight activity that the Site Office Manager would consider valuable.), ▪ identifies and assigns personnel to review specific functional areas, locations, and/or departments (The use of participants in the field augmentation program should be considered in the establishment of the team.), ▪ obtains and distributes documents and other information for more detailed planning (e.g., reports from previous oversight activities, operational awareness activities, the Contractor’s and DOE Site Office’s assessments, ORPs reports, and lists of high risk work completed and/or planned), ▪ schedules a separate data collection visit, if warranted, upto three weeks before the oversight activity, and ▪ issues the formal review plan for the oversight activity.
<p>Four to six weeks before the oversight</p>	<p>The Team Leader:</p> <ul style="list-style-type: none"> ▪ identifies and satisfies the team’s logistics needs, such as an

activity	<p>onsite workspace, computer and other equipment support, PPE requirements, and access authorizations and training, and</p> <ul style="list-style-type: none"> ▪ leads team planning meetings or teleconferences. <p>Team Members:</p> <ul style="list-style-type: none"> ▪ review the objectives and proposed scope of the oversight activity, and any management guidance and expectations, ▪ become familiar with the results of previous activities and the CRADs for their assigned area(s), and ▪ review and analyze initial documentation available and propose to the team leader data collection plans to assess their assigned areas utilizing the CRADs.
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Data Collection and Assessment (with informal validation of facts): Team members typically begin providing full-time support for the oversight activity during this phase of the oversight activity. The level of effort expected for each team member for the few weeks proceeding the oversight activity should be discussed in the review plan approved by EA-30 management.

Within three weeks of the oversight activity,	<p>The Team Leader:</p> <ul style="list-style-type: none"> ▪ ensures team members are getting and reviewing data or information per their proposed data collection plans, ▪ meets weekly with the cognizant director in the Office of Environment, Safety, and Health Assessments summarizing the status of the team’s reviews and any significant changes to the formal plan for the oversight activity, ▪ schedules the entrance and exit briefs with the DOE Site and Contractor management, and ▪ schedules daily internal team meetings (if warranted) and meetings between the team and the DOE Site and Contractor POCs for while the team is onsite for the oversight activity. <p>Team Members:</p> <ul style="list-style-type: none"> ▪ review data and information provided and revise their review plan as warranted (e.g., to include additional data collection activities such as reviewing additional documentation, conducting interviews on-site, observing work, touring facilities) to assess performance in their assigned areas, ▪ periodically discuss the potential findings with the team lead and to the extent possible draft summaries of any potential findings, opportunities for improvement, and their overall assessment of their assigned areas for inclusion in the oversight report,
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	<ul style="list-style-type: none"> ▪ provide a written summary of their findings identified to-date for the lead technical writer's (if assigned) and the team leader's review no later than the Wednesday before the Final Data Collection and Validation Period on-site for the oversight activity, and ▪ provide the Team Leader, by the Wednesday before the Final Data Collection and Validation Period, a list of any additional data collection activities that need to be scheduled.
<p>During the Planning and Initial Data Collection Visit on-site (if used) – This data collection visit is normally a week occurring one to three weeks before the Final Data Collection and Validation Period on-site for the oversight activity.</p>	<p>Team Leader:</p> <ul style="list-style-type: none"> ▪ leads an entrance meeting and team meetings with DOE Site Office and Contractor POCs, as warranted, to expedite data collection and analysis. <p>Team Members:</p> <ul style="list-style-type: none"> ▪ execute and revise, as necessary, their data collection plans.
<p>During the Final Data Collection and Validation Period on-site for the oversight activity</p>	<p>The Team Leader:</p> <ul style="list-style-type: none"> ▪ leads an entrance meeting (including Site and Contractor management if warranted), internal team meetings (if warranted), daily meetings with DOE Site and Contractor POCs, and the exit meeting with senior DOE Site Office and Contractor management, ▪ summarizes the status of the team's reviews and significant potential findings being identified with the cognizant director in the Office of Environment, Safety, and Health Assessments on a daily basis, and ▪ meets with DOE Site and Contractor management to discuss significant potential findings as they are developed and any issues impeding the team's reviews. <p>Lead Technical Writer/Mentor (if assigned, otherwise these tasks are performed by the Team Lead or Team Members as directed):</p> <ul style="list-style-type: none"> ▪ identifies and coordinates the review of findings that potentially exist in areas assigned to multiple team members, ▪ reviews the findings, opportunities for improvement, and other draft portions of the closeout summary being developed by the team members, and ▪ develops the closeout summary of the key results and potential findings to be reviewed by EA-30 management and provided to the senior DOE Site and Contractor managers during the exit

	<p>meeting.</p> <p>Team Members:</p> <ul style="list-style-type: none"> ▪ discuss the facts and significance of potential findings, trends, and opportunities for improvement with the cognizant DOE Site Office and Contractor subject matter experts and POCs before the daily team meeting, ▪ brief, as directed by the team leader, potential findings and opportunities for improvement in their areas of responsibility at the daily team meetings with the DOE Site Office and Contractor POCs, ▪ provide the key results and significant potential findings for the closeout summary for the lead technical writer (if assigned) or the team leader’s review by the deadline established by the team leader. ▪ provide their portions of the report for the lead technical writer’s (if assigned) or team leader’s review on a not-to-interfere basis with providing their input for the closeout summary, and ▪ review the portions of the report written by their peers as requested by the team leader.
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Oversight Activity Reporting (including formal validation): The oversight activity report should be provided to EA-1 for approval within the goal of 60 days after the date of the closeout summary.

<p>Within one week of leaving the site for the oversight activity</p>	<p>Team Leader:</p> <ul style="list-style-type: none"> ▪ summarize key results from the oversight activity and discuss lessons learned and potential process improvements for future oversight activities at the next staff meeting. <p>Team Members:</p> <ul style="list-style-type: none"> ▪ provide their final edits for their portions of the report to the lead technical writer (if assigned) and team leader and ▪ provide the Team Leader any lessons learned or potential process improvements for future oversight activities.
<p>Within two weeks of leaving the site for the oversight activity</p>	<p>Team Leader and the Lead Technical Writer/Mentor (if assigned):</p> <ul style="list-style-type: none"> ▪ review the final edits provided by the team members on their portions of the report. <p>Team Members:</p> <ul style="list-style-type: none"> ▪ resolve any comments received from the team leader or the lead technical writer/mentor, and ▪ peer review other portions of the report as directed by the team

	leader.
Within three weeks of leaving the site for the oversight activity	<p>Team Leader:</p> <ul style="list-style-type: none"> ▪ compile the report with the lead technical writer/mentor (if assigned), ▪ provide the consolidated report to the cognizant EA-30 office director for review, ▪ obtain agreement from the cognizant EA-30 office director on the timeline for: <ul style="list-style-type: none"> • submitting the report into the technical and publishing editing processes, • scheduling the review of the report by the QRB, • sending the report to the site for a factual accuracy review by the DOE Site Office and Contractor and to an authorized derivative classifier on-site to support releasing the report to the public. Request they complete their reviews within 10 working days.
Within five weeks after leaving the site for the oversight activity	<p>Lead Technical Writer (if assigned):</p> <ul style="list-style-type: none"> ▪ address comments from the technical editing review process. <p>Team Leader:</p> <ul style="list-style-type: none"> ▪ discuss the plan to resolve comments from the DOE Site Office and Contractor with the cognizant EA-30 director, ▪ submit the report to the Director of the Office of Environment, Safety, and Health Assessments for review, and ▪ submit a clean version of the report to the EA-30 administrative staff for distribution to the QRB members (such that the QRB members will receive it at least 48 hours prior to the scheduled QRB).
Within six weeks after leaving the site	<p>Team Leader:</p> <ul style="list-style-type: none"> ▪ brief the QRB on the oversight activity and comments from the DOE Site Office and the Contractor, ▪ resolve any QRB, DOE Site, and Contractor comments in a comment resolution matrix and maintain a markup of changes based on QRB comments, and ▪ submit a clean version of the report to the EA-30 administrative staff for inclusion into EACT.

The team leader should continue to work with the cognizant director in EA-30 to obtain EA-1 approval of the report within the goal of 60 days after the date of the closeout summary.

APPENDIX B

Types of Small Team Oversight Activities

Targeted Assessments: This is an established program of reviews across the DOE complex that is selected by Office of Enterprise Assessments based on input from various sources, such as the Nuclear Safety Coordinating Committee, that considers complex-wide information. Topics for targeted assessments are identified in memorandum and are systematically and formally planned, executed, and reported according to a documented review plan. Targeted assessments are conducted at multiple sites across the DOE complex, using one or more EA-30 personnel participating on reviews for consistency, and may include a separate summary report documenting complex-wide results in addition to the individual oversight activity reports.

Limited-scope Assessments: These are formal assessments that are identified in approved EA-30 schedules and are systematically and formally planned, executed, and reported according to a documented assessment plan. There are two different methods commonly used for accomplishing assessments: compliance and performance-based. Compliance assessments focus on verifying compliance with requirements through the implementation of procedures, and begin with a determination of the contractual and regulatory requirements governing the assessed organization. Performance-based assessments focus first on the adequacy of the process that produced a product or service, and then on the product itself. If problems are found in the product or work processes, the assessor evaluates the methods and procedures used to implement the applicable requirements in an effort to find the failure that led to the problems. In performance-based assessments, emphasis is placed on getting the full story on a problem before coming to a conclusion.

Concurrent Assessments: These are either targeted assessments or limited scope assessments conducted concurrently with Site Office or Contractor assessment activities. EA-30 concurrent assessments typically include additional areas of focus to supplement the site assessments and cover any gaps identified by EA-30, the Site Office or the Contractor; e.g., additional criteria related to the line management oversight activity may be included such as follow-up on findings or other concerns.