



The Secretary of Energy

Washington, DC 20585

April 26, 1993

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Conway:

The enclosed Action Plan and Analysis are forwarded as provided for in our Implementation Plan for Recommendation 92-2 regarding the Facility Representative program at defense nuclear facilities.

The Facility Representative program supports the safe operation of our defense nuclear facilities. This Action Plan tasks the cognizant Program Secretarial Officers and Field Office Managers to make improvements using the Action Plan guidance. This approach recognizes the Department's changing defense mission and diverse facilities and allows for the effective management of programs and resources.

Sincerely,

A handwritten signature in black ink, appearing to read "Hazel R. O'Leary", written in a cursive style.

Hazel R. O'Leary

Enclosures



The Secretary of Energy
Washington, DC 20585

April 26, 1993

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MEMORANDUM FOR ASSISTANT SECRETARY FOR DEFENSE PROGRAMS
ASSISTANT SECRETARY FOR NUCLEAR ENERGY
ASSISTANT SECRETARY FOR ENVIRONMENTAL RESTORATION
AND WASTE MANAGEMENT
DIRECTOR OF ENERGY RESEARCH
MANAGERS, DEPARTMENT OF ENERGY FIELD OFFICES

SUBJECT: ACTION PLAN FOR THE DEFENSE NUCLEAR FACILITIES
SAFETY BOARD RECOMMENDATION 92-2 CONCERNING
FACILITY REPRESENTATIVES

The attached Action Plan tasks you with improving the Department's Facility Representative programs. It provides a flexible approach that recognizes our changing missions and diverse set of nuclear facilities. This is an excellent opportunity for the Department to conduct a coordinated review and to improve this important element of our nuclear facility management.

The Office of Nuclear Energy is assigned the lead in this effort. All other Departmental elements are tasked to assist as provided for in the Action Plan.


Hazel R. O'Leary

Attachment

U.S. Department of Energy

**ACTION PLAN
TO STRENGTHEN THE
FACILITY REPRESENTATIVE PROGRAM
AT DOE DEFENSE NUCLEAR FACILITIES**

**U.S. Department of Energy
Assistant Secretary for
Nuclear Energy**

March 1993

ACTION PLAN TO STRENGTHEN THE
FACILITY REPRESENTATIVE PROGRAM
AT DOE DEFENSE NUCLEAR FACILITIES

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ACTION PLAN TO STRENGTHEN THE
FACILITY REPRESENTATIVE PROGRAM
AT DOE DEFENSE NUCLEAR FACILITIES

I. INTRODUCTION

The purpose of this plan is to prescribe a series of actions that will substantially improve the Department of Energy's (DOE's) Facility Representative programs and present the details of that process. This Action Plan delineates the specific actions required of each element of the DOE organization and is based on the Facility Representative guidance document attached to this Action Plan.

The analysis of existing Facility Representative programs confirmed the presence of wide variations in how Field Organizations were implementing Facility Representative programs. Wide variations were noted in selection procedures, educational and experience requirements for selection into the Facility Representative program, training requirements and training programs, criteria and practices used for assigning Facility Representatives, and the definition of duties, responsibilities, and authorities. Although some Facility Representative programs were operating well, other, less mature programs could benefit from a more structured and formal program. This Action Plan and the attached guidance document were developed by learning from the successful, well developed Facility Representative programs and is designed to improve the less mature programs while minimizing the impact on the well running programs. This approach acknowledges that the Department's wide range of defense nuclear facilities can require significant differences in the Facility Representative's specific duties, and responsibilities. These variations also reflect differences in management styles among the Field Organizations and Program Secretarial Officers (PSOs). Each style may have its advantages, and should not detract from the overall effectiveness of the Facility Representative program. Thus, the Action Plan is directed at providing the guidance needed to ensure that Facility Representatives assigned to defense nuclear facilities across the DOE complex possess comparable qualifications, consistent with the hazard and activity levels of the assigned facilities.

The activities in this Action Plan must be coordinated with the Department's 5 Year Plan to Improve Technical Recruitment, Training and Development, as described in the Secretary's February 17, 1993 response to the Defense Nuclear Facilities Safety Board (DNFSB)

Recommendation 92-7. Likewise, the activities in this Action Plan must be coordinated with the Action Plan for the DNFSB Recommendation 91-1, which commits the Department to a comprehensive assessment of the staffing, qualifications, and training of DOE Headquarters, field office, and contractor organizations involved in the development and implementation of standards.

This document is organized as follows: an introduction; a brief background discussion; the primary action items with their associated roles and responsibilities; the detailed responsibilities for specific actions or activities associated with each of the Action Items; and, a schedule to complete each of the Action Items.

II. BACKGROUND

On May 28, 1992, the DNFSB forwarded to the Secretary Recommendation 92-2 dealing with the Facility Representative programs at the Department's defense nuclear facilities. The Department responded by accepting the Board's Recommendation noting that due to the differences in facilities within the Department, some variance in Facility Representative requirements may prove to be appropriate, and some existing Facility Representative programs may prove to be currently in a state acceptable to the Department. The Department's response committed to provide an implementation plan to:

- A. Conduct an analysis of the existing DOE Facility Representative programs at defense nuclear facilities, and
- B. Use the results either to establish a more structured and formal Facility Representative program at these facilities, or to improve, if needed, those already performing well.

On November 5, 1992, the Department forwarded to the Board the Recommendation 92-2 implementation plan. This implementation plan describes the approach the Department will take in response to Recommendation 92-2. Additionally, the implementation plan requires the development of this Action Plan to identify specific commitments and schedules to quickly implement improvements in DOE Facility Representative programs.

In accordance with commitment A above, the Department has conducted an analysis of the existing DOE Facility Representative programs. This effort involved the review and analysis of

The principal documentation relevant to the existing Facility Representative programs, and discussions with many of the people within Headquarters and the Field Organizations responsible for establishing these programs. The analysis confirmed the Board's views that there are wide differences in Facility Representative qualifications, duties, and responsibilities among the various DOE defense nuclear facilities. However, it was apparent that much thought and effort has been devoted to this new program by many Field Organizations. Similarities in several of the existing Facility Representative programs make it clear that many individuals responsible for establishing the programs have been in communication and exchanging views with each other. While this is to their credit, it does not satisfy the need for centralized direction.

During the initial planning for an assessment of the staffing of existing Facility Representative programs, it was recognized that centralized guidance would have to be provided before any meaningful evaluation of the existing programs could be conducted. The analysis of the existing programs identified portions of several programs that were considered to be well thought-out and thoroughly documented. Based on comments received on an early guidance document, and by drawing freely on the existing program descriptions, a document titled Guidelines for Establishing and Maintaining a Facility Representative Program was drafted. This document provides guidance on facility coverage and staffing; duties and responsibilities; and training and qualification requirements, including examinations and qualification and is attached to this Action Plan. Following a more extensive review and comment period, the document will become the basis for a DOE standard on Facility Representative programs.

III. ROLES AND RESPONSIBILITIES

Based upon the concerns expressed by the DNFSB in Recommendation 92-2, and the results of the analysis of existing Facility Representative programs, five primary Action Items have been identified that are considered essential for the establishment of an effective Facility Representative program at each of the Department's defense nuclear facilities. These actions are listed below.

1. Review existing Facility Representative programs to determine how well each program meets the Guidelines for Establishing and Maintaining a Facility Representative Program.

2. Develop a plan for establishing and maintaining an effective Facility Representative program at each Field Organization.
3. Develop recruitment and retention techniques and incentives appropriate for the Facility Representative program, including special monetary allowances, if appropriate.
4. Develop training for Facility Representatives.
5. Develop a DOE Standard for Facility Representative Programs.

The successful completion of these actions will require cooperative effort from each of the Headquarters and field elements responsible for the Facility Representative programs. Following is a summary of the DOE organizational roles and responsibilities with regard to each of the activities specified in this Action Plan:

A. Office of Nuclear Energy (NE)

1. Coordinate all Departmental interactions with DNFSB related to Recommendation 92-2, including quarterly reports concerning defense nuclear facilities.
2. Coordinate all department wide planning on the Facility Representative program.
3. Coordinate input and reviews by other PSOs and Field Organizations.
4. Support AD in the identification of Facility Representative personnel issues, and the development of a training program for Facility Representatives.
5. Develop the Facility Representative Guidelines (attached) into a DOE Standard.

B. The Office of Administration and Management (AD)

1. Chair working group with representation from NE and affected Field Organizations to identify Facility Representative personnel issues and problems.
2. Perform job analysis of the Facility Representative function. Based on the job analysis, develop the following:

- Model position descriptions and supporting evaluation statements at all appropriate grade levels;
 - Model selection criteria;
 - Model performance elements and standards;
 - Descriptive package of recruitment and retention techniques and incentives;
 - Model career progression patterns for Facility Representatives.
3. Based on the results of the job analysis, and in consultation with affected PSOs and Field Organizations, develop training for Facility Representatives.

C. Program Secretarial Officers (PSOs)

1. Review and approve planning documents from NE.
2. Support AD in its task of developing a training program for Facility Representatives.
3. Review and approve specific implementation plans from Field Organizations concerning their facilities.
4. Provide Field Organizations with the necessary resources to implement effective Facility Representative programs, based on a review of the Field Organization implementation plans.
5. For defense nuclear facilities, provide quarterly updates to NE for inclusion in reports to DNFSB.

D. Field Organizations

1. Develop facility specific implementation plans. Submit plans to PSOs for approval.
2. Implement the Facility Representative program as provided for in the approved implementation plans from PSOs.
3. For defense nuclear facilities, provide quarterly updates to PSOs for inclusion in reports to DNFSB.
4. Participate in the AD working group to identify and solve Facility Representative personnel issues.
5. Support AD in the development of Facility Representative training.

V. DETAILS OF ACTION PLAN

The following are the specific actions or activities associated with each of the five Action Items, and the organizational responsibilities for each item:

ACTION ITEM 1:

REVIEW EXISTING FACILITY REPRESENTATIVE PROGRAMS TO DETERMINE HOW WELL EACH PROGRAM MEETS THE GUIDELINES FOR ESTABLISHING AND MAINTAINING A FACILITY REPRESENTATIVE PROGRAM

Actions:

Determine the Facility Representative coverage requirements for each nuclear facility.

Each Field Organization will assess the Facility Representative coverage requirements of its nuclear facilities based on the attached Guidelines document. In addition to identifying which facilities require Facility Representative coverage, this assessment will include the degree of coverage required for each facility. Based on this assessment, each Field Organization will determine the personnel and management resources needed to establish and maintain an effective Facility Representative program.

Evaluate the staffing for existing Facility Representative programs against the staffing requirements identified in the previous action.

Each Field Organization will evaluate its Facility Representative program to determine its staffing adequacy in terms of the number and qualifications of Facility Representatives assigned to its nuclear facilities.

Determine the adequacy of general, site-specific, and facility-specific training and examination requirements for existing Facility Representative programs.

Each Field Organization will conduct a review to determine the adequacy of its Facility Representative training program in terms of the general, site-specific, and facility-specific subject matter and the quality of training being provided. This will support the development of training provided for in Action Item 4.

ACTION ITEM 2:

DEVELOP A PLAN FOR ESTABLISHING AND MAINTAINING AN EFFECTIVE FACILITY REPRESENTATIVE PROGRAM AT EACH FIELD ORGANIZATION

Actions:

Field Organizations will develop a plan to ensure that effective Facility Representative coverage, and the appropriate degree of coverage, is provided for all DOE defense nuclear facilities.

Each Field Organization will develop a plan for establishing and maintaining a Facility Representative program. The plan must provide for selection, training and assignment of qualified Facility Representatives to DOE defense nuclear facilities. The plan will address the deficiencies identified as a result of assessments required by Action Item 1, and propose corrective actions for each deficiency. In cases where insufficient staff is available, facilities with the most risk must be staffed first. The plans will be submitted to the facility PSOs for approval. Each plan will provide the following information:

- A list of all defense nuclear facilities for which the Field Organization is responsible that require Facility Representative coverage, the amount of coverage required for each, and whether there is a Facility Representative currently assigned to the facility.

The criteria and practices used for assigning DOE Facility Representatives to each defense nuclear facility, or group of lesser facilities;

- A staffing plan for the Facility Representatives identified above that includes:
 - A plan to upgrade the qualification of incumbents;
 - A prioritized list of vacant Facility Representative positions;
- A description of generic, site-specific, and facility-specific training available to the Facility Representative candidates, required training that is not available within the Field Organization, and proposed sources for the required training.
- A summary of Facility Representative recruitment and retention problems experienced by the Field Organization, and suggestions for making the DOE Facility Representative position more attractive and career-enhancing.

Provide a report to DNFSB on the Department's plans for ensuring the effectiveness of its Facility Representative program at defense nuclear facilities.

- PSOs will transmit to NE copies of the Field Organizations' plans for establishing Facility Representative programs for their defense nuclear facilities.
- A DOE report to the DNFSB will be prepared by NE containing a summary description of the Department's plans for establishing and maintaining an effective Facility Representative program at all DOE defense nuclear facilities for which such coverage is considered to be necessary.

Provide quarterly reports to the cognizant PSOs on the status of the Facility Representative programs.

- The Field Organization will provide the facility PSOs quarterly status reports until the Facility Representative programs are well established. These reports should accurately reflect changes in any of the subject areas described in the Field Organizations' plans for establishing their Facility Representative programs at defense nuclear facilities.

Prepare summary quarterly reports on the status of the DOE Facility Representative programs.

- Each PSO will provide the Office of Nuclear Energy (NE) a summary report on the status of its Facility Representative programs at defense nuclear facilities.
- NE will prepare a consolidated status report on the defense nuclear facilities Facility Representative programs for submission to the DNFSB on a quarterly basis.

ACTION ITEM 3:

DEVELOP RECRUITMENT AND RETENTION TECHNIQUES AND INCENTIVES APPROPRIATE FOR THE FACILITY REPRESENTATIVE PROGRAM, INCLUDING SPECIAL MONETARY ALLOWANCES IF APPROPRIATE

Actions:

Conduct a review of personnel practices and procedures affecting the recruitment or retention of highly qualified Facility Representatives.

The Office of Administration and Management (AD) will chair a working group with representation from the PSOs and the affected Field Organizations to identify the range of personnel issues and problems affecting the Department's ability to attract and retain highly qualified Facility Representatives. Attention will be given to grade and salary limitations that may be unduly restrictive on recruiting practices, in particular, restraints imposed by the practice of measuring responsibility predominantly in terms of numbers of individuals supervised.

Perform job analysis of the Facility Representative function.

AD will conduct a comprehensive job analysis of the Facility Representative function, as it is intended to operate within the various DOE environments. This analysis will serve as the foundation for other personnel actions taken to support the program.

Develop model position descriptions.

Based on the job analysis, AD will develop model position descriptions and supporting evaluation statements at all appropriate grade levels. These will guide and assist Field Organizations in exercising their delegated classification authority.

Develop model selection criteria.

Based on the job analysis, AD will develop model selection criteria to ensure that candidates are screened against the knowledge, skills, and abilities required to complete the training program and for successful performance as a Facility Representative.

Develop model performance elements and standards.

Based on the model position descriptions, AD will develop model performance elements and standards, which can help assure that good performance is rewarded and poor performance is corrected.

Develop recruitment and retention techniques and incentives.

AD will develop a descriptive package of recruitment and retention techniques and incentives appropriate to the Facility Representative program, including monetary allowances. These techniques and incentives can then be applied by PSOs and Field Organization Managers, as they deem appropriate, to provide for Facility Representative recruitment, retention, and performance based incentives.

Develop model career progression patterns for Facility Representatives.

AD will develop model career progression patterns for Facility Representatives.

ACTION ITEM 4:

DEVELOP TRAINING FOR FACILITY REPRESENTATIVES

Facility Representatives are required to meet stringent and comprehensive qualification standards. These standards will be developed and implemented through training, examination, and documentation using the "Manager" category as defined in DOE 5480.20, "Personnel Selection, Qualification, Training, and Staffing Requirements at DOE Reactor and Non-reactor Facilities" as a guide for appropriate program requirements. In addition, the training sequence will satisfy DOE 5700.6C, Criterion 2, "Personnel Training and Qualification." AD will assist the PSOs and Field Organizations with the development of training for Facility Representatives.

Actions:

Define the training requirements for DOE Facility Representatives.

Based on consultation with PSOs and selected Field Organizations, the results of the job analysis to be conducted under Action Item 3, the analysis of existing Facility Representative programs, and the draft Guidelines for Establishing and Maintaining a Facility Representative Program, AD will develop the generic training requirements for Facility Representatives.

Develop training for Facility Representatives.

AD will work with the recently approved DOE Energy Facility Training Center (the DOE Academy) to develop a program to support Facility Representative training. Pertinent training programs existing within the DOE complex, other Federal or state agencies, or that are available from commercial sources, will be identified and used to meet the training requirements for Facility Representative candidates as well as incumbents.

Develop appropriate training sequence for Facility Representatives.

AD, in consultation with the affected Field Organizations, will develop guidelines for the appropriate sequence of training for Facility Representatives, establishing priorities for training in the fundamental activities expected of Facility Representatives, site-specific, and facility-specific training, and advanced generic training.

Develop guidance on the use of written or oral examinations in the qualification of Facility Representatives.

AD will develop guidelines on how written and oral examinations may be used in the qualification of Facility Representatives, and the limitations on their use by existing Federal regulations. This subject will also be addressed from the standpoint of re-qualification and upgrading of incumbent Facility Representatives.

ACTION ITEM 5:

DEVELOP DOE STANDARD FOR FACILITY REPRESENTATIVE PROGRAMS

Actions:

The document "Guidelines for Establishing and Maintaining a Facility Representative Program" will be recast as a DOE Standard for Facility Representative Programs.

The Guidelines for Establishing and Maintaining a Facility Representative Program, will be recast and approved as a DOE Standard after a more complete review process. This process will include information from the implementation of Facility Representative programs based on the current guidelines.

SCHEDULES

ACTION ITEM 1: REVIEW EXISTING FACILITY REPRESENTATIVE PROGRAMS TO DETERMINE HOW WELL EACH PROGRAM MEETS THE GUIDELINES FOR ESTABLISHING AND MAINTAINING A FACILITY REPRESENTATIVE PROGRAM.

1. Field Organizations will determine the Facility Representative coverage requirements for each defense nuclear facility May 21, 1993
2. Field Organizations will evaluate the staffing for existing Facility Representative programs against the staffing requirements identified in the previous activity June 1, 1993
3. Field Organizations will determine adequacy of general and facility-specific training and examination requirements for existing Facility Representative programs June 1, 1993

ACTION ITEM 2: DEVELOP A PLAN FOR ESTABLISHING AND MAINTAINING AN EFFECTIVE FACILITY REPRESENTATIVE PROGRAM AT EACH FIELD ORGANIZATION.

1. Field Organizations will develop a plan to ensure that effective Facility Representative coverage, and the appropriate degree of coverage, is provided for all DOE defense nuclear facilities.
Submission of plans to PSOs June 21, 1993
2. Submission of approved plans to NE by PSOs August 2, 1993
3. NE will prepare status report to DNFSB and a summary of the Department's plans for ensuring the effectiveness of its Facility Representative program at defense nuclear facilities August 20, 1993

4. Field Organizations will provide quarterly reports to the cognizant PSOs on the status of the Facility Representative programs at defense nuclear facilities. (Quarterly starting November 1, 1993)
5. NE will prepare summary quarterly reports to DNFSB on the status of DOE Facility Representative programs at defense nuclear facilities. (Quarterly starting December 1, 1993)

ACTION ITEM 3: DEVELOP RECRUITMENT AND RETENTION TECHNIQUES AND INCENTIVES APPROPRIATE FOR THE FACILITY REPRESENTATIVE PROGRAM, INCLUDING MONETARY ALLOWANCES UNDER THE FEDERAL PAY COMPARABILITY ACT.

1. Review of personnel practices and procedures affecting recruitment or retention, by AD, NE, and Field Organizations April 15, 1993
2. AD will perform job analysis of Facility Representative function June 1, 1993
3. AD will develop model position descriptions August 1, 1993
4. AD will develop model selection criteria September 1, 1993
5. AD will develop model performance elements and standards September 1, 1993
6. AD will develop model recruitment and retention techniques and incentives September 1, 1993
7. AD will develop model career progression patterns for Facility Representatives September 1, 1993

ACTION ITEM 4: DEVELOP TRAINING FOR FACILITY REPRESENTATIVES

1. AD, with support of NE and Field Organizations, will develop generic training requirements for DOE Facility Representatives May 1, 1993
2. AD will develop centralized generic training, as needed, to support Facility Representative training requirements December 1, 1993
3. AD will develop appropriate training sequence for Facility Representatives July 1, 1993
4. AD will develop guidance on the use of written or oral examinations for a Facility Representative position September 1, 1993

ACTION ITEM 5: DEVELOP DOE STANDARD FOR FACILITY REPRESENTATIVE PROGRAMS.

1. Distribute draft DOE Standard on Facility Representatives April 16, 1993
2. Receive comments on draft DOE Standard June 15, 1993
3. Completion date for Facility Representative Standard August 15, 1993