



Department of Energy
Washington, DC 20585

January 18, 1996

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DNF SAFETY BOARD

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW
Washington, DC 20004

Dear Mr. Conway:

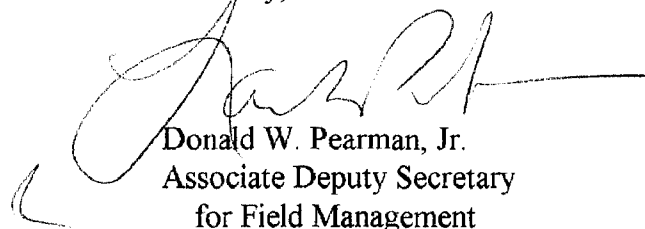
This letter transmits the Department of Energy's (DOE) Quarterly Status Report on the DOE Facility Representative Program. The Department continues its strong commitment to this program and to continued improvement of our safety processes. Our Facility Representatives are vital links between our line programs and DOE contractors in ensuring safe operations at our defense nuclear facilities.

The Office of Field Management continues to work with our field sites to implement an effective Facility Representative Program. This is being done in close coordination with the Facility Representative Steering Committee, the Program Offices, and our field offices' training personnel. The Department is also looking past program implementation to program maintenance, and has developed performance indicators to track field performance on a quarterly basis.

Enclosed is the Department's October through December 1995 status report for Recommendation 92-2. This report addresses the remaining action items for 92-2 as agreed upon by Tim Dwyer and Max Clausen of our respective staffs.

If you have any questions, please feel free to contact Joseph Hassenfeldt at 202 586-1643.

Sincerely,



Donald W. Pearman, Jr.
Associate Deputy Secretary
for Field Management

Enclosure



Enclosure 1

FACILITY REPRESENTATIVE PROGRAM ACTION PLAN ACTION ITEM STATUS

Commitment 2, Actions 3, 4 - The Facility Representative (FR) Program has been implemented, and now moves to a phase of maintaining the program's integrity. Attachment 1 to this Enclosure is a copy of the set of Performance Indicators the field will be reporting quarterly to the Program Offices and the Office of Field Management.

Commitment 4, Action 8 - Field Organizations have developed qualification cards and standards for their FRs at their respective facilities. Per discussions with DNFSB Staff, samples of these qualification standards are available for review. This review is to be scheduled in early January 1996.

Commitment 4, Actions 10, 11, 12 - Our Facility Representative Program Managers in the field have reported that they do not require any additional training resources to support the qualification of any of the current FRs. The Technical Personnel Program Coordination Committee (TPPCC) is coordinating the training resources required to satisfy the training needs in support of DNFSB Recommendation 93-3 regarding technical training. The TPPCC is coordinating the development of training resources required by each of the functional area qualification standards, including Facility Representatives, and any site specific training needed as a part of 93-3.

Commitment 5, Action 5 - The Department's Program Offices and the Office of Field Management have performed reviews of the Field Offices' implementation of the Facility Representative Program. Copies of these reviews have been forwarded to the DNFSB as they have been performed, or as enclosures with Field Management's quarterly status reports. Most offices have shown that their programs adequately meet the implementation intent of DOE-STD-1063 "Implementing and Maintaining a Facility Representative Program at DOE Nuclear Facilities."

The one exception to this statement is the Richland Operations Office (RL). During their review, they were graded as unsatisfactory in meeting the intent of DOE-STD-1063. RL has submitted to Field Management a comprehensive report of corrective actions taken and further actions planned in response to the weaknesses cited in their report. Based on these changes in policy and program direction, their FR program now adequately meets the intent of DOE-STD-1063.

Commitment 6 - The Facility Representative Steering Committee has reviewed program implementation, and, based on site visits, program documentation, and discussions with FRs and FR Managers, has found that implementation in the field is satisfactory. All effected field organizations have program manuals or directives in place, the program is 96% staffed complex-wide (219 onboard, 223 desired), and qualifications continue to improve, with 54% of FRs core/interim qualified, and 26% of FRs are fully qualified. Anecdotal evidence continues to show cases where accidents, injuries, and equipment damage were avoided solely due to the presence of DOE Facility Representatives.

United States Government

Department of Energy

memorandum

DATE: December 21, 1995

REPLY TO

ATTN OF: FM-10 (Hassenfeldt, 202 586-1643)

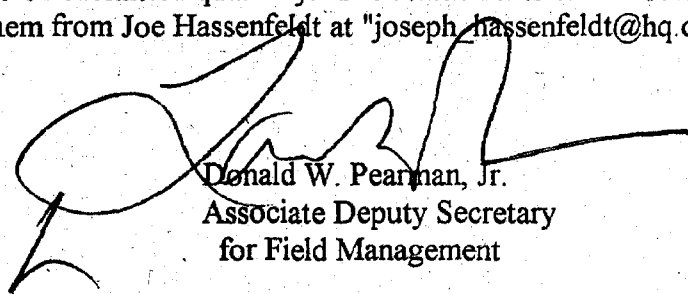
SUBJECT: Quarterly Submission of Performance Indicators for Facility Representative Programs

TO: Distribution

The Department of Energy (DOE) is making significant progress in implementing the Defense Nuclear Facilities Safety Board's (DNFSB) Recommendation 92-2, regarding the DOE Facility Representative Program. As the program moves from an implementation phase to a maintenance phase, it becomes extremely important to monitor program performance metrics.

In order to maintain program momentum, and apprise the appropriate HQ program officials of developments in the Facility Representative Program, please have the Manager responsible for your Facility Representative Program complete the attached Performance Indicator (PI) forms quarterly for formal submission to the cognizant HQ program offices, with a copy to the Office of Field Services and Liaison, FM-10. The first quarterly report is due February 29, 1996. These metrics were developed by field personnel and approved by the Facility Representative Steering Committee.

Attachment 1 gives background, explanation, and instructions on the PIs, and Attachment 2 provides the one-page sheet to be submitted quarterly. The attachments can be obtained electronically by requesting them from Joe Hassenfeldt at "joseph_hassenfeldt@hq.doe.gov".



Donald W. Pearman, Jr.
Associate Deputy Secretary
for Field Management

Attachment

Distribution

B. G. Twining, Albuquerque Operations Office
C. J. Langenfeld, Chicago Operations Office
F. M. Stewart, Golden Field Office
J. M. Wilcynski, Idaho Operations Office
T. Vaeth, Nevada Operations Office
J. Turner, Oakland Operations Office
J. C. Hall, Oak Ridge Operations Office
J. P. Hamric, Ohio Field Office
J. D. Wagoner, Richland Operations Office
M. N. Silverman, Rocky Flats Field Office
M. P. Fiori, Savannah River Operations Office

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Bob Poe	OR
Tom Daniels	RL
Mike Weis	RF
Frank McCoy	SR

Scott Rogers	EM
Ken Kellar	DP
Matt Hutmaker	NE
Joe Arango	EH
Ray Schwartz	ER
Tim Dwyer	Defense Nuclear Facilities Safety Board Staff

Final Draft Facility Representative Performance Indicators

Background: Carefully chosen performance indicators (PI) can provide valuable measures of the effectiveness of Facility Representative (FR) programs. These PIs can be used by DOE-HQ to evaluate DOE-wide program effectiveness. Other PIs may be useful at a local level to determine the need for local program changes, depending on the circumstances that may be unique to a site.

DOE-wide FR PIs should be relatively few in number, be easy to measure and report, be applicable to all FR programs, and should be resistant to misinterpretation. Since effectiveness in providing contractor oversight may be difficult to capture in measurable terms, some subjective measures may also have to be developed. In other words, just because we can count it doesn't mean it counts, and just because we can't count it doesn't mean it doesn't count.

The attached PIs have been agreed upon by the FR Steering Committee and many FRs in the Field. Comments for future improvements are welcomed by FM-10, the Office of Field Services and Liaison.

General Points:

1. The attached PIs are for DOE-wide use. Operations Offices are encouraged to develop and use local PIs that suit their own needs.
2. PIs for DOE-wide use are divided into the following categories: Staffing, Training and Qualification, Safety Impact and Effectiveness, and Fulfilling the FR Role.
3. PIs that measure contractor performance numbers have been avoided as measures of FR program effectiveness.
4. PIs should be reported quarterly, no later than the second month of the quarter, should reflect program status as of that month, and should be sent to appropriate HQ program officials, with copy to FM-10.
5. Proposed PIs, their methods of calculation, and goals (or targets) are presented in the following tables.

Attachment 1

STAFFING			
TYPE	INDICATOR NAME	HOW TO CALCULATE	GOAL
DOE-wide	Staffing level	$\frac{\text{Number of FR positions filled}}{\text{Number of FR positions}}$ <p>* A comment field should be provided for any explanations that would be required.</p>	100% Number of FR positions should be consistent with DOE-STD-1063-93 guidance
DOE-wide	Attrition	Number of FRs leaving the FR program this calendar quarter. A comment should be provided indicating reason (e.g. promoted, resigned from DOE, lateral transfer, etc.)	N/A

TRAINING AND QUALIFICATION			
TYPE	INDICATOR NAME	HOW TO CALCULATE	GOAL
DOE-wide	% of FRs Base Qualified	$\frac{\text{Number of FRs base qualified}}{\text{Number of FRs}}$	None
DOE-wide	% of FRs Qualified to DOE-wide Technical Qualification Standard	$\frac{\text{Number of FRs qualified to DOE FR TQS}}{\text{Number of FRs}}$	None
DOE-wide	% of FRs Fully Qualified	$\frac{\text{Number of fully qualified FRs}}{\text{Number of FRs}}$	Greater than 75%

Attachment 1

SAFETY AND PERFORMANCE IMPACT ON CONTRACTOR			
TYPE	INDICATOR NAME	HOW TO CALCULATE	GOAL
DOE-wide	Performance Improvements caused by FR actions	Number and type of improvement at a site or facility each calendar quarter	N/A
<p>This 'subjective' indicator is a management judgement of which improvements in contractor safety or operational performance substantially resulted from FR involvement. Types of improvements can be classified as:</p> <ol style="list-style-type: none"> 1 Compliance to requirements is improved 2 Safety is improved somewhat or risk is somewhat reduced 3 Safety is significantly improved or risk is significantly reduced <p>To convey to DOE-HQ management and oversight (e.g. DNFSB) anecdotal as well as quantitative data, the performance improvement PI should include the number and type, and a brief description (one sentence) of the improvement. Examples include:</p> <p>Type 1 Contractor shipping documentation now meets DOE and 49CFR requirements Radcon posting violations significantly reduced FR intervention prevented several drawing control violations ORPS reports more timely and accurate</p> <p>Type 2 RWPs more accurately reflect stay times, limits and PPE Contractor lock and tag procedure adherence much better ORPS report corrective actions more effective at preventing recurrence leading to fewer reportable occurrences</p> <p>Type 3 FR stopped work in trench when imminent hazard existed due to improper sloping and heavy equipment operation in vicinity FR actions held up the start of a hazardous process which did not have adequate worker protection from high radiation fields FR identified TSR violation or USQ</p>			

Attachment 1

FULFILLING THE FR ROLE			
TYPE	INDICATOR NAME	HOW TO CALCULATE	GOAL
DOE-wide	FR Time Spent in the Field/Plant (plant walk-throughs, surveillance, assessments, etc.) Overtime/comp time hours count in both numerator and denominator	Average number of hours FRs collectively spend in the plant/field each month ----- Number of available work hours each month* *only neglects weekends and holidays. Also denominator only includes number of hours expected by DOE-STD-1063-93, if the FR is a part-time FR.	Greater than 40%
DOE-wide	FR Time Spent Performing Contractor Oversight (includes time in field/plant as above, and procedure reviews at desk, ORPS activities at desk, etc.)	Average number of hours FRs spend performing contractor oversight each month ----- Number of available work hours each month* *only neglects weekends and holidays	Greater than 60%

Attachment 2

STAFFING			
ITEM NUMBER	INDICATOR NAME	ACTUAL PERFORMANCE	GOAL
1	Staffing level		100%
2	Attrition		N/A
TRAINING AND QUALIFICATION			
3	% of FRs Base Qualified		None
4	% of FRs Qualified to DOE-wide Technical Qualification Standard		None
5	% of FRs Fully Qualified		Greater than 75%
SAFETY PERFORMANCE IMPACT ON THE CONTRACTOR			
6	Performance Improvements caused by FR actions	Attach a list of improvements. Give type of each.	N/A
FULFILLING THE FR ROLE			
7	FR Time Spent in the Field/Plant (plant walk-throughs, surveillance, assessments, etc.) Overtime/comp time hours count in both numerator and denominator		Greater than 40%
8	FR Time Spent Performing Contractor Oversight (includes time in field/plant as above, as well as procedure reviews at desk, ORPS activities at desk, etc.)		Greater than 60%

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DATE: December 21, 1995

REPLY TO
ATTN OF: FM-10 (J. J. Hassenfeldt:6-1643)

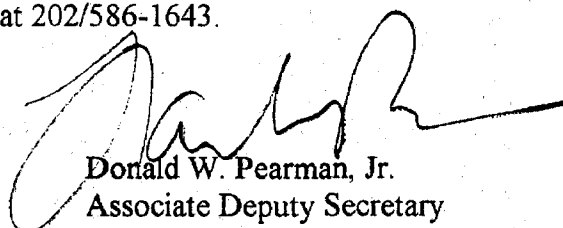
SUBJECT: Facility Representative Program Review at the Oak Ridge Operations Office

TO: Manager, Oak Ridge Operations Office

The attached report describes the facility representative program review conducted at the Oak Ridge Operations Office (OR) from December 4-5, 1995. The OR facility representative program is satisfactory.

A draft copy of the report was provided to Oak Ridge management, and a review debrief took place on December 5, 1995. At that meeting, Oak Ridge was presented with review conclusions, along with recommendations for improvement. Oak Ridge managers were extremely receptive to review comments and recommendations. Additional comments or changes to the draft report could be incorporated through December 19, 1995. No additional written comments were submitted by OR.

Any questions regarding the facility representative program review, or this report, should be addressed to Joe Hassenfeldt, FM-10, at 202/586-1643.



Donald W. Pearman, Jr.
Associate Deputy Secretary
for Field Management

Attachment

cc:
K. Kellar, DP-311
S. Rogers, EM-4
R. Schwartz, ER-8
R. Poe, DOE-OR

Attachment 2

STAFFING			
ITEM NUMBER	INDICATOR NAME	ACTUAL PERFORMANCE	GOAL
1	Staffing level		100%
2	Attrition		N/A
TRAINING AND QUALIFICATION			
3	% of FRs Base Qualified		None
4	% of FRs Qualified to DOE-wide Technical Qualification Standard		None
• 5	% of FRs Fully Qualified		Greater than 75%
SAFETY PERFORMANCE IMPACT ON THE CONTRACTOR			
6	Performance Improvements caused by FR actions	Attach a list of improvements. Give type of each.	N/A
FULFILLING THE FR ROLE			
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8	FR Time Spent Performing Contractor Oversight (includes time in field/plant as above, as well as procedure reviews at desk, ORPS activities at desk, etc.)		Greater than 60%

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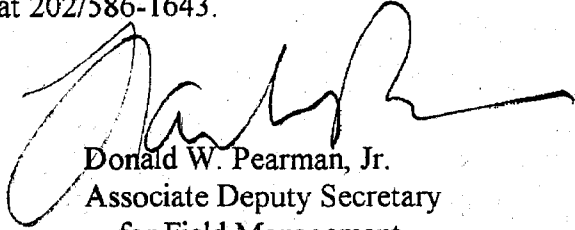
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R. Poe, DOE-OR

**Facility Representative Program Review
Oak Ridge Operations Office
December 4 - 5, 1995**

SUMMARY

The Office Field Services and Liaison (FM-10) performed a review of the Oak Ridge Operations Office (OR) Facility Representative Program (FRP) on December 4 - 5, 1995. The objective of this review was to ascertain the degree of implementation of the Facility Representative (F/R) programs at OR; to evaluate progress made during the past year; and to evaluate overall effectiveness of this program in improving contractor operations of OR facilities.

The facility representative program review consisted of interviews with twelve facility representatives (formal interviews with 7 F/R's, and informal interviews with 5 additional F/R's) and the FRP Manager; and a review of other associated program documentation. Interviews were conducted with F/Rs from Environmental Restoration (ER), Waste Management (WM), Y-12, K-25, Oak Ridge National Lab (ORNL), the Continuous Electron Beam Accelerator Center (CEBAF), and the High Flux Isotope Reactor (HFIR). The review conclusion is that the DOE-OR Facility Representative Program is satisfactory.

FACILITY REPRESENTATIVE PROGRAM REVIEW

Program Policy and Directive

An approved program directive exists as the Oak Ridge "Facility Representative Program Manual." This directive establishes the policy, responsibilities, and procedures for the DOE-OR FRP and the requirements for the site offices which report to DOE-OR. It addresses FRP requirements, selection, training, qualification, duties and responsibilities, authority, program assessment, and oversight relationship with operating contractors. The directive satisfies the intent of DOE-STD-1063-93, "Establishing and Maintaining a Facility Representative Program at DOE Nuclear Facilities," of August 1993.

The directive does not address the specific reporting relationships necessary to ensure good communication of issues up to management, and more specifically does not address contractor requirements for the reporting of occurrences to the cognizant F/R.

Program policy and directive are satisfactory.

Staffing

Facility staffing levels are based on facility hazards and activity level. Written records of staffing analyses are kept by each site, and have been reviewed, evaluated, or reassessed within the past year.

Staffing levels generally follow DOE-STD 1063-93 with one notable exception. In the OR Environmental Restoration (ER) program area there has been increased activity, addition of facilities, and a low initial staffing estimate. Additionally, excessive administrative functions, and programmatic work assignments (such as Operational Readiness Reviews) appear to have been limiting the amount of time that F/Rs spend in their facilities. ER has performed a staffing analysis (October 1995) which shows the program to be staffed at less than 50% of the required level.

OR staffing is satisfactory, but the ER program changes without increased staffing and the assigning of programmatic work to F/Rs show weaknesses in the ER program area.

Training and Qualification

The OR training and qualification program is well delineated in the OR program description. Core requirements necessary for F/R qualification are documented on a qualification card, and the program specifies walk-throughs, on-the-job training, and self-study. Performance standards for satisfactory completion of qualification items and facility requirements have been developed at most sites, and are under development at the remainders. Proficiency training and requalification are also addressed in DOE-OR policy.

Training and qualification are satisfactory.

Written and Oral Examinations

Requirements for oral and written examinations are delineated in the OR program manual, and the OR Training and Development Division has very specific procedures for development of exams. However, examinations have been developed only at Y-12, and have yet to be developed at other sites. Examination development will be completed by next year.

Written and oral examinations are satisfactory.

Responsibilities and Duties

F/R responsibilities, authority and duties are delineated in the OR program manual. Stop work authority is specifically addressed, and well understood by the F/Rs and contractors. Unencumbered access is also addressed. F/Rs state that most issues identified by the F/R are handled by the contractor as they are identified and that it is seldom necessary to involve DOE-OR upper management in issue resolution.

Responsibilities and duties are satisfactory.

Records

Qualification and training records are maintained by the OR Training and Development Division, and F/Rs maintain their own qualification cards. The F/Rs utilize the log books required by the OR program to track deficiencies and corrective action progress.

Records are satisfactory.

Management Support

Senior management at OR has demonstrated an extremely high level of support for the Facility Representative Program, including discussions with the DNFSB, and senior support of a quarterly F/R meeting at OR. The strongest site specific programs also have active support in the OR middle management. This emphasizes the importance of the entire program chain in a successful facility representative program.

CONCLUSIONS

The Facility Representative program at OR is satisfactory. The grade is indicative of a program which adequately implements DOE guidelines for the establishment and maintenance of a facility representative program.

RECOMMENDATIONS

- Address the staffing deficiencies identified by the Environmental Management program.
- Continue aggressive development of site/facility specific standards, and written and oral examinations. Strong consideration should be given to obtaining exam banks from other Operations Offices as a starting point, and making additions or deletions as appropriate for OR sites and facilities.
- In order to increase middle management support, OR should encourage managers to conduct walk-throughs of their responsible facilities with their Facility Representatives.

September 5, 1995

Operations Assessment and Facility Representative
Program Review
Richland Operations Office
August 14 - 18, 1995

SUMMARY

The Offices of Operations Assessment (EM-25) and Field Services and Liaison (FM-10) performed a review of the Richland Operations Office (RL) Operations Assessment and Facility Representative Programs from August 14 to 18, 1995. The purpose of these reviews was to evaluate RL's effectiveness in improving contractor operations through its operations assessment program and to determine whether Departmental requirements are being met for the facility representative program. The operations assessment program review included observations of an RL partial assessment of the Building 340 Waste Handling Facility, interviews with assessment team members and the assessment team leader, interviews with operations assessment program coordinators, and a review of program documentation. The facility representative program review consisted of interviews with six facility representatives, the facility representative coordinator and the facility representative program manager, attendance at the RL facility representative monthly meeting, observations of a facility representative performing assessment activities, an audit of facility representative training and qualification records and a review of other associated program documentation.

OPERATIONS ASSESSMENT PROGRAM

Application of the Graded Approach

Approved graded approach matrices meeting the requirements of DOE Order 5480.19 paragraph 5.c exist for Westinghouse and Pacific Northwest Laboratory facilities at Hanford. However, although Bechtel Hanford Incorporated has submitted a matrix to RL for Hanford environmental restoration activities, the matrix is not yet approved by the operations office. The review team did not review this draft matrix.

Application of the graded approach at RL facilities is satisfactory.

Assessment Performance

During the program review, the team observed a partial assessment of the 340 Waste Handling Facility. A partial operations assessment covers selected areas of concern from DOE Order 5480.19. It typically involves 1-4 people over a period of 1-3 days. In general, the personnel conducting the assessment of the 340 Waste Handling Facility were knowledgeable of the basic principles and techniques of performance-based assessment, the guidance contained in the EM-25 Operations Assessment Field Handbook, and

the use of approved graded-approach matrices and facility policies and procedures as the basis of the assessment.

RL assessors consisted of the 340 Area Facility Representative, two assessors from Site Operations Division, and one assessor from Waste Operations Division. To determine the scope of the assessments the RL assessment team leader took into account the results of previous operations assessments at other Hanford facilities which had indicated possible site-wide deficiencies in the areas assessed. The team leader also elected to review some previously unreviewed chapters of DOE Order 5480.19.

Once on-site, RL assessors introduced themselves and briefed facility management regarding assessment scope. During the assessment, RL assessors demonstrated the ability to identify leads, pursue these leads, and develop findings (individual deviations from requirements) and concerns (programmatic breakdowns or widespread deficiencies) based on observations of activities, interviews, and document reviews. Facility management was provided with the results of the assessment verbally, and a written report will be transmitted to the contractor at a later date.

Based on a review of 11 partial operations assessment reports, there is a wide variation in quality and depth. Some (such as the one observed during this review) provide in-depth analysis and identify significant findings and concerns. Others appear to be very cursory, and do not indicate any analysis to discover programmatic breakdowns.

Full assessments are also conducted by RL. A full operations assessment covers all eighteen chapters of DOE Order 5480.19, and also reviews operational aspects of training, radiological control, and maintenance. It typically involves at least 5 people over a period of at least one week. Although none were observed during this review, the Office of Operations Assessment recently participated in a full operations assessment led by RL Performance Assessment Division (PAD) at the 242-A Evaporator and found this assessment to be effective at identifying findings and concerns. A review of six recent full assessment reports indicates that RL full assessments include a comprehensive review of conduct of operations, training, radiological controls, and maintenance (the EM program only requires that conduct of operations implementation be comprehensively evaluated - training, radiological controls, and maintenance are required to be evaluated only to the extent that they impact operations). RL full assessments are generally effective at identifying significant findings and concerns. For example, a recent assessment at B-plant uncovered serious programmatic deficiencies in management programs, maintenance work control, radiological control practices, and training. Part of Westinghouse Hanford Company's corrective action included changes in facility management.

The performance of full assessments at RL is the strongest aspect of the RL Operations Assessment Program, but improvement in the quality and uniformity of partial assessments is needed.

Overall, assessment performance is satisfactory.

Assessment Schedule

RL does not have an approved master schedule that accomplishes required full and partial assessments over a two-year period. Responsibility to manage the EM Operations Assessment Program is split between Performance Assessment Division (PAD) (for full assessments) and individual facility representatives (for partial assessments). PAD has developed a draft (unapproved) schedule which requires that full assessments be completed at all EM activities every two years. The draft schedule also indicates partial assessments for each facility. Since March 1995, the full assessment portion of this schedule has been closely adhered to and updated as necessary. However, the partial assessment portion of this schedule is not executed site-wide. Most divisions do not even recognize it as a valid schedule at all. Some operating divisions have developed different schedules for partial assessments, but none of the divisional schedules inspected fully meet EM program requirements, and none of them are integrated with the full assessment schedule. In short, partial assessments are not coordinated or scheduled in any cohesive manner site-wide.

Overall, since partial assessments (which account for 75% of all required assessments) are rarely conducted, and are not effectively scheduled, managed or integrated with RL full operations assessments, the scheduling of operations assessments at the Richland Operations Office is unsatisfactory.

Completion of Operations Assessments

Full Assessments:

RL has completed one full assessment at six out of 20 facilities within the past year. This is below the minimum requirement of once every two years for each facility (about 10 per year at Hanford). However, this situation has improved significantly in the last six months. Since March 1995, full assessments have been performed at a rate of about one every six weeks. Completed full assessments include:

PNL (Bldg 327) - 9/94
 242A Evaporator - 11/94
 Plutonium Finishing Plant - 3/95
 PUREX/WESF - 4/95
 B Plant - 6/95
 East Tank Farm Transition Project - 7/95

Partial Assessments:

RL has completed one partial assessment at 11 out of 20 facilities within the past year. This is far below the minimum requirement of three every two years per facility at six month intervals (about 30 total per year at Hanford). Completed partial assessments include:

East and Waste Tank Farm Transition Projects - 11/94 (both)

Electric Utilities - 4/95
Steam and Water Utilities - 5/95
222S Laboratory - 5/95
K Basins - 5/95
340 Liquid Effluent Treatment - 5/95, 8/95
FFTF - 6/95
T Plant - 6/95
Solid Waste - 6/95

In spite of over three years since the beginning of the EM Operations Assessment Program, at least four of twenty Hanford facilities have never received an operations assessment under this program. These facilities include Bechtel Hanford Incorporated environmental restoration activities, the 200 Area Liquid Effluent Treatment Facility, PNL Buildings 324/325 and FMEF (including 300 Area Fuel Supply & 308 Bldg).

Overall, RL has performed only about 43% of the assessments they should have performed over the past year (60% of required full assessments and 37% of required partial assessments). Between November 1994 and March 1995, RL elected to stop performing the EM Operations Assessment Program. This accounts somewhat for the failure of RL to complete the required number of assessments during the past year. Indeed, had RL continued to perform full assessments at the current rate for the entire past year, the required number of full assessments would likely have been completed.

Partial assessments, however, are clearly not being performed at a sufficient rate to accomplish three every two years at six month intervals at each facility, regardless of program suspension. Until recently, partial assessments were rarely, if ever, performed at Hanford. Although some are now performed, partial assessments are still not performed at a sufficient periodicity. One factor contributing to this situation is the fact that no approved master operations assessment schedule exists, and no single person or division is responsible and empowered to ensure that partial assessments get conducted.

The completion of operations assessments at RL is unsatisfactory.

Follow-up to Ensure Corrective Action

This area is the most significant weakness in the RL Operations Assessment Program.

Deficiencies include the following:

1. Contractors are able to escape rigorous corrective action implementation and reporting by assigning low priority levels in the Hanford Action Tracking System (HATS). HATS is the system used by RL and Hanford operating contractors to track and report correction of assessment and surveillance deficiencies. Using this tracking system, the contractor assigns priorities to assessment deficiencies. Based on the contractor assigned priority, an assessment concern or finding may be assigned a priority sufficiently low to allow the contractor not to report completion

of corrective action. At least three examples were discovered from recent assessment reports where the contractor assigned such a low priority to an assessment concern, and therefore did not report completion of corrective action. RL does not maintain sufficient oversight of the contractor's deficiency prioritization or corrective action implementation.

2. Findings and Concerns from most partial assessments are not being formally transmitted to the contractor, and are not being entered into HATS (or its predecessor tracking system - CICS). With the exception of the assessments performed by the Tank Operations Division (a total of 2 partial assessments), RL has not formally transmitted the results of any partial assessment to the contractor for corrective action. Therefore, operating contractors are not taking any action as a result of the large majority of RL partial assessments.

3. The Performance Assessment Division (PAD) does not follow-up to track satisfactory completion of corrective actions from full assessments they conduct.

Unless RL retains full ownership of the assessment process and demands accountability by the contractor for assessment deficiencies, the RL Operations Assessment Program will be of little or no effectiveness in improving contractor operations.

Corrective action follow-up by RL is unsatisfactory.

Integration with the award fee process

At present, RL operating division directors meet on a semi-annual basis to determine award fee. At these meetings, the results of full operations assessments performed by PAD are used as a factor in award fee determination.

PAD has recently instituted a numerical assessment grading system. Future plans include the use of numerical conduct of operations assessment grades as a direct scaling factor for part of the award fee. When implemented, this measure will provide a very strong link between conduct of operations performance and award fee.

Integration with the award fee process is satisfactory.

Assessment Reports

Full assessment reports are usually distributed about one month after the completion of the assessment. Reports of full assessments are provided to contractors, HQ program managers and the Office of Operations Assessment. Full assessment reports are generally of good quality and depth, and identify significant findings and concerns.

Partial assessment reports are usually not provided to contractors and HQ program managers (only EM-25). Reviews of reports from previously conducted RL partial assessments indicate a wide variation in the quality,

depth, and format of these assessments. Some partial assessments appear to be very cursory, and do not identify concerns. In many cases, partial assessment reports do not conform to format guidelines provided by EM-25.

Assessment reports are satisfactory.

FACILITY REPRESENTATIVE PROGRAM

Program Policy and Directive

An approved program directive exists as "Richland Operations Office Facility Representative Program, RLID 1300.1B." This directive establishes the policy, responsibilities and procedures for the Richland Operations Office Facility Representative Program. It identifies the program requirements, the selection requirements, the training and qualification process, duties and responsibilities, authority, reporting relationships, event response, record keeping assessment and oversight relationship with the operating contractors and laboratories. The current program directive was issued November 6, 1994, and a revision is in preparation that will reflect the management and policy changes being implemented during the conduct of this review (for example, the current version of the program directive specifies that the Assistant Manager for Facility Transition is in charge of this program, but the Assistant Manager for Waste Management is now in charge of it). The directive satisfies DOE-STD-1063-93, "Establishing and Maintaining a Facility Representative Program at DOE Nuclear Facilities", of August, 1993 with two exceptions: 1) guidance on the documented determination of the basis for assigning facility representatives to facilities based on hazard, complexity, and level of activity is not addressed in the directive, and 2) it does not specifically require that a facility representative complete qualification prior to performing the duties of the position.

Program policy and directives are satisfactory.

Staffing

RL has 24 positions identified for facility representatives and has 23 incumbents with 12 of them being fully qualified to the program directive requirements. The staffing requirements were established by the Assistant Manager (AM) for Operations (no longer an organizational position at RL) prior to issuance of DOE-STD-1063-93. There is no documentation demonstrating that the assignments were made based on the systematic evaluation of the hazards of the facility, the number of buildings/areas involved, size, complexity, and level of activity as defined in DOE-STD-1063-93. Under the current organization, the facility representatives assigned to the AM for Facility Transition and the AM for Waste Management represent the significant majority of the qualified facility representatives at RL. Most other facility representatives have not yet completed qualification.

Staffing is evaluated as unsatisfactory.

Training and Qualification

The knowledge, skills, and abilities necessary for facility representative qualification are documented on a qualification card. The qualification process is defined in the implementing directive and is accomplished in phases with a 30%, an 80%, and a final oral examination as well as a 50% and comprehensive final written examination. Initial qualification is clearly defined. However, the requalification requirements are general and lack enough definition for an individual facility representative to pursue without added detail. Training methods include classroom, self-study, required reading, and practical on the job training. The qualification card communicates the training requirements.

Some significant deficiencies and inconsistencies were noted in this area, including the following:

- 11 of 23 (48%) facility representatives are not fully qualified on their assigned facilities. Moreover, these facility representatives are not restricted from performing as fully qualified staff, in violation of DOE-STD-1063-93 requirements.
- In some cases facility representatives are not examined at the interim progress points in their qualification as required by RL policy to ensure that they are making reasonable progress toward completion of their qualification.
- The qualification of facility representatives following reassignment to a new facility has not received emphasis and is not being completed in accordance with the implementing directive.
- In some cases, signature blocks on facility representative qualification cards are not signed by a qualified facility representative or division director (when required), but instead are signed by other individuals.

Training and qualification are evaluated as unsatisfactory.

Written and Oral Examinations

Written and oral examinations are developed in accordance with DOE Guide to Good Practices on that subject. Written procedures governing the examination process are contained in the implementing directive and address administration practices, grading, passing criteria, and security either directly or by reference. There is no examination validation process outlined in the documentation. The oral board composition is documented, evaluation procedures are provided, and there are question banks for both written and oral boards.

Written and oral examinations are evaluated as satisfactory.

Responsibilities and Duties

The facility representative responsibilities, authority and duties are delineated in the implementing directive RLID 1300.1B. Stop work authority and unencumbered access are specifically addressed. The conduct of oversight duties is captured in the implementing directive. However, facility representative understanding and implementation of program policy varies widely. For example:

- Most of the facility representatives interviewed did not know the identity of the facility representative program manager. This situation is the result of recent and repeated changes in program administration and direction. However, all facility representatives interviewed demonstrated an understanding of the reporting chain through line program management for safety and health concerns.

- At Laboratory Management Division, facility representatives are assigned some programmatic duties not related to safety, health and protection of the environment in these organizations.

- Unqualified facility representatives' understanding and performance of their duties varies significantly from individual to individual. RL policy does not specifically address interim qualification for or roles and responsibilities of unqualified facility representatives, so individual unqualified facility representatives (or their division directors) decide how to spend their time. At Tank Operations Division, one unqualified facility representative stated that he spends the majority of his time conducting oversight activities in the tank farms, while others stated that they spend relatively little (as little as 20% or less) of their time conducting oversight activities. Records of Tank Operations Division staff time utilization for January through July 1995 indicate that on average, unqualified facility representatives actually spent only about 16% of their time conducting oversight (although this percentage varied significantly from individual to individual), since a large portion of time (40%) was spent on training.

- At facilities containing significant surface contamination hazards, some facility representatives stated that they rarely, if ever, don anti-contamination clothing to tour surface contamination areas in their facilities. Others, however, stated that they don anti-C's on a weekly or even daily basis to tour surface contamination areas.

- Some facility representatives were not aware of qualification time limits and requalification requirements.

Duties and responsibilities are evaluated as unsatisfactory.

Records

Qualification records and applicable certification documents are kept by the RL training organization.

Records are evaluated as satisfactory.

Conclusions

Operations Assessment Program:

The Operations Assessment Program at the Richland Operations Office is unsatisfactory. This grade is primarily due to the following program deficiencies:

1. RL does not demand that the contractor address all assessment concerns, allows the contractor to assign priority to corrective actions without DOE input or approval, and does not closely monitor corrective action implementation.
2. Partial assessment concerns and findings are not being tracked by RL. Most partial assessments are not formally transmitted to the contractor and little or no corrective action results from these assessments. These assessments are therefore of little value at improving operations.
3. RL does not manage partial assessments site-wide to ensure they are scheduled or performed as required and that they are integrated with the Performance Assessment Division's full assessment program.
4. The required number of assessments are not performed. No approved master biennial schedule exists to accomplish the required number of assessments at each facility.

Facility Representative Program:

The Facility Representative Program at Richland Operations Office is unsatisfactory. Although the RL program policy possesses all of the required elements and meets the requirements of the "Facility Representative Program Guidelines" in the FM-1 letter of December 2, 1993, that policy has not been effectively implemented site-wide. Implementation of the program is inconsistent, as evidenced, for example, by the lack of sufficient numbers of qualified facility representatives at some divisions. Implementation has also been slowed due to repeated changes in direction and management. Some examples of strong facility representative performance exist. For instance, the 222S facility representative's efforts were instrumental in affecting necessary management changes at that facility. Also, the B-Plant facility representative has aggressively pursued operational improvements at that facility.

However, facility representative program management changes and lack of consistent leadership in the past have slowed progress toward full site-wide implementation of an effective program over the past year. Program implementation at Tank Operations Division, Laboratory Management Division, and Environmental Restoration Division departs significantly from RL policy requirements (particularly in the area of facility representative qualification) and does not yet meet the objectives of program policy.

RL has recently placed management of this program under the Assistant Manager for Waste Operations (AMW). This individual has demonstrated an

understanding of necessary program improvements and has stated a strong desire to fully implement the program policy. The Richland Operations Office Manager has also stated his commitment to providing strong support to the AMW. If the AMW is, in fact, given the authority to implement program policy across all divisions, the facility representative program has the potential to succeed.

Recommendations

For the Operations Assessment Program:

Ensure corrective action for every assessment concern. Demand that the contractor formally disposition all assessment concerns. RL should maintain involvement with the contractor in assigning priority to assessment concerns. The assessment organization should follow-up to ensure completion of corrective actions.

Approve a master schedule. Approve a master assessment schedule that accomplishes one full assessment and three partial assessments every two years for each Hanford facility or activity.

Perform partial assessments. Assign responsibility for scheduling and performing partial assessments to one person or organization and empower them with the resources and authority to carry out the program. Performance Assessment Division (which schedules and performs full assessments) is the logical place for this duty to reside.

Review and approve ER graded approach matrix. Review, direct necessary modifications to, and approve a graded approach matrix for Bechtel Hanford Incorporated environmental restoration activities.

For the Facility Representative Program:

Empower the program manager to affect real change. Stop changing program managers. Keep the present manager and provide him the necessary authority for the site-wide implementation of program policy. Support that manager to achieve complete implementation of the program across all operating divisions. RL has already developed a path forward to satisfy this recommendation. The Operations Office Manager has personally committed to empowering the AMW to achieve full program implementation across all operating divisions. Rapid improvement is anticipated.

Perform a facility representative coverage and staffing analysis. The Assistant Managers with facility representatives should conduct a systematic documented review of the assignment of facility representatives to facilities/areas based on their hazard, complexity, number of facilities/areas, and activity level. Use the results of this analysis to make adjustments in facility representative staffing and assignments.

Strive to achieve and maintain 100% qualification. Complete initial qualification for those facility representatives (presently 9 of 23) not

yet qualified. Complete requalification for those facility representatives recently transferred to a new facility (presently 2 of 23) in a timely manner. Consider establishing a facility representative training pipeline or similar process such that a replacement facility representative will be available in the event that a facility's incumbent facility representative is promoted and/or transferred out of the position. Consider developing a rigorous technical examination to screen potential facility representative candidates. This will ensure that (before hiring) facility representatives possess the multi-disciplinary technical knowledge needed to effectively perform this job.

**Operations Assessment and Facility Representative
Program Review
Rocky Flats Field Office
August 23 - 25, 1995**

SUMMARY

The Office of Operations Assessment (EM-25) performed a review of the Rocky Flats Field Office (RFFO) Operations Assessment and Facility Representative Programs from August 23 to 25, 1995. The purpose of this review was to evaluate RFFO's effectiveness in improving contractor operations through these programs and to determine whether Departmental requirements are being met. The review also served as the final determination as to whether the commitments detailed in an RFFO memorandum to EM-20 dated December 22, 1994, have been completed. The review included observations of a full assessment at Building 707; interviews with the assessment team leader and team members, Facility Representatives, the CONOPS Assessment Program Manager, the Assistant and Deputy Managers for Operations and Waste Management, Office of Training and Development personnel, the Facility Operations Division Director, the Site Support Division Director, and the Facility Representative Program Manager for Environmental Restoration; and reviews of the RFFO Conduct of Operations Assessment Program Procedure, assessment schedules and reports, the Facility Representative Program Plan, qualification and training records, and other associated documentation.

OPERATIONS ASSESSMENT PROGRAMApplication of the Graded Approach

As identified during the FY-94 program review, the graded-approach matrices submitted by EG&G in May 1994 do not meet the requirements of DOE 5480.19. These matrices do not describe where and how each of the guidelines of the Order are applied within the contractor's existing policies and procedures.

Shortly after completion of the FY-94 review, RFFO personnel met with EG&G management to discuss this issue and were provided with "conformance" matrices that were designed to map the requirements of DOE 5480.19 to existing contractor policies and procedures. After reviewing these matrices, RFFO determined that they did not adequately resolve the issue. In January 1995, RFFO directed EG&G to provide revised graded-approach matrices to Standards, Performance, and Assurance (SPA) within ninety days. EG&G management responded in April stating that due to the current contractor change and the long-term commitments made in graded-approach

matrices, revision of the matrices would be premature at this time. Additionally, EG&G stated that a submittal date would be provided to RFFO by July 31, 1995. The Kaiser-Hill team has not yet met this commitment. As a result, graded-approach matrices that meet the requirements of DOE 5480.19 have not yet been developed and submitted to RFFO for approval.

Assessment Performance

During the program review, EM-25 personnel observed a full assessment conducted by RFFO assessors at Building 707. Most assessment team members were knowledgeable of the basic principles and techniques of performance-based assessment, the guidance contained in the EM-25 Operations Assessment Field Handbook, and the use of graded-approach matrices and facility policies and procedures as the basis for the assessment.

The RFFO assessment team consisted of three qualified Facility Representatives, three Facility Representatives in training, two personnel from Standards, Performance, and Assurance, and two personnel from Environmental, Safety, and Health (ES&H). Only two of these assessors, the assessment team leader and a qualified Facility Representative, have completed the Operations Assessment course conducted by EM-25.

Once on-site, RFFO assessors met to perform assessment planning and conducted an assessment in-brief for Building 707 management. During the assessment, RFFO assessors demonstrated the ability to identify leads, "pull-the-string," and develop findings and concerns based on observations of activities, interviews, and document reviews. A de-brief was planned to provide assessment results to facility management and a written report will be completed.

Assessment Schedule

RFFO's operations assessment schedule requires that full assessments (that include all applicable guidelines of DOE 5480.19) be completed at all non Site Support Division facilities every two years. Due to the number of Facility Representatives assigned to this division and the lack of assessment resources available from other divisions, more comprehensive partial assessments (that include four to six chapters of DOE 5480.19) are conducted at these facilities in lieu of full assessments. Although this provides similar coverage of CONOPS elements as a full assessment, it does not meet EM Operations Assessment Program requirements.

Partial assessments (that include all applicable guidelines of one chapter of DOE 5480.19) are completed at all EM facilities once every six months

between scheduled full assessments. This partial assessment schedule meets EM Operations Assessment Program requirements.

Completion of Operations Assessments

RFFO has completed thirteen of fourteen full and partial assessments scheduled since the last program review. Full assessments completed in the last year include Building 779, Buildings 371/374, and the 400 Area. Partial assessments were completed at Buildings 776/777; Building 991; Operable Unit One and Building 891; Plant Services; Building 707; Building 559; Regulated Waste Operations; Analytical Labs; Building 771; and the 800 Area. A partial assessment of Plant Services was rescheduled to allow implementation of Conduct of Operations. Three of these assessments were not completed by the scheduled due date.

Follow-up to Ensure Corrective Action

All programmatic breakdowns (concerns) identified during assessments are required to be entered into the Performance Tracking System (PTS) by the M&O contractor. RFFO SPA tracks progress made and completion of corrective actions using this system, and verifies that concerns are adequately corrected during subsequent assessments.

Integration with the award fee process

In the past, the results of operations assessments have been factored into the EG&G award fee determination process. RFFO is currently working on incorporating operation assessment results into Kaiser-Hill's performance-based contract.

Assessment Reports

A review of 12 assessment reports completed within the last year found that important management and safety concerns were documented with findings to support these concerns. There is, however, a wide variation in quality and depth. Some assessment reports, usually those that document the results of full assessments, provide more in depth analysis with findings and concerns and others appear to be very cursory. In general, partial assessment reports provide significantly less detail and are of less value to facility management.

Written assessment reports are distributed to facility management and SPA usually within one week after completion of the assessment. Assessment reports are provided to HQ program managers and EM-25 on a quarterly basis as required.

FACILITY REPRESENTATIVE PROGRAM

Program Policy and Directive

Most of the elements of a site specific program directive exist as individual division procedures. They are not contained in a single comprehensive document and lack sufficient detail in some instances. The Facility Representative Training and Qualification Program, RFFOP 3410.5 of 8/21/95, adequately captures those elements relating to training and qualification. The elements relating to recruitment and selection, duties, responsibilities and authorities, reporting relationships, event response, records, F/R program assessment and relationship with contractors are inconsistent and fragmented within and across the three divisions that have F/Rs.

Staffing

Staffing requirements are not documented by management based upon the hazards of the facility, the number of buildings/areas involved, size, complexity, and the level of activity. Discussions with management indicate that these factors were considered in making F/R assignments but there is no documentation to support present staffing levels. Interviews with F/Rs and management indicate that F/Rs are not burdened with inordinate amounts of administrative or programmatic work. Qualification of F/Rs is on schedule to be completed in a reasonable amount of time.

Training and Qualification

The knowledge, skills and abilities necessary for F/R qualification is documented on a qualification card and is supported by a corresponding qualification standard. The qualification process is defined in RFFOP 3410.5. Training program methods consist of classroom, self-study, required reading, and practical/on-the-job training. The training requirements are communicated to the F/R in the form of a qualification card. Progress is monitored periodically by both the Office of Training and Development and Division Directors.

Written and Oral Examinations

Formal procedures for oral and written examinations are delineated in RFFOP 3410.5. Written exam procedures address question development and answers, administration, proctoring, grading, passing criteria, and security. RFFOP 3410.5 adequately addresses the oral examination process, including procedures for board composition, administration, documentation and passing criteria.

Responsibilities and Duties

F/R responsibilities, authority, and duties are described in several individual division procedures. These documents generally lack sufficient detail and thereby do not effectively communicate the total scope of F/R roles and responsibilities. Stop work and shutdown authority is specifically addressed in reasonable detail by individual divisional procedures. F/Rs are tasked by line management to periodically assess facility operations on a formal, periodic basis. The process is part of the EM Operations Assessment Program which is a formal method that documents the results of performance based assessments of such areas as contractor operational performance, management controls, and worker health and safety. F/Rs interviewed are very knowledgeable and understand their responsibilities and duties. They all have the full support of line management including full access to their Assistant Managers. They periodically brief management (including facility walkthroughs) on facility status and other matters of interest.

Records

Qualification cards and all applicable certification documents are maintained by the Office of Training Development. This requirement is specified in RFFOP 3410.5, F/R Training and Qualification Program.

CONCLUSIONS

The Operations Assessment Program at the Rocky Flats Field Office is satisfactory. All commitments detailed in the RFFO Memorandum to EM-20 dated December 22, 1994, have been achieved. This satisfactory grade is a result of significant improvements made in most program areas during this fiscal year. For example, operations assessments are usually completed on time. In general, operations assessors are knowledgeable of the basic principles and techniques of performance-based assessment, the guidance contained in the EM-25 Operations Assessment Field Handbook, and the use of approved graded-approach matrices and facility policies and procedures as the basis for the assessment. Finally, a process has been established to track concerns identified during assessments and facilitate completion of corrective actions.

The RFFO Facility Representative (F/R) program and progress made since the F/R baseline assessment was evaluated. A grade of satisfactory has been assigned. The overall grade of satisfactory is indicative of a program which addresses all requirements and is progressing toward, or has the potential of, meeting the program objectives identified in the December 2,

1993 program memo ("Facility Representative Program Guidelines") issued by EM-1. This memo established expectations and the minimum standard that shall be required for all F/R programs. Current program status, progress made, and achievement of the program objectives was weighed by the team in determining the grade. The RFFO F/R program is still not fully and consistently implemented. However, significant progress has been made since the baseline review was conducted.

RECOMMENDATIONS

EM-25 provides the following recommendations to assist RFFO in their efforts toward achieving excellence in operations assessment, contractor conduct of operations, and Facility Representative employment:

- Obtain graded-approach matrices from Kaiser-Hill that meet the requirements of DOE 5480.19. Review and approve these matrices as soon as possible.
- Conduct full assessments of Site Support Division Facilities every two years as required.
- Require all operations assessors to complete the Operations Assessment training course provided by EM-25.
- Issue a single comprehensive program directive applicable to all RFFO elements that employ F/R's. This program directive should address those aspects of the F/R program described in DOE-STD-1063-93.
- Establish a systematic, documented method of assigning F/R's based on the hazards of the facility, the number of buildings or areas involved, their size, complexity, and the level of operational activity.