

## CONDUCT OF OPERATIONS (OP)

### OBJECTIVE

**OP.1:** The Site Office has oversight processes and procedures in place and has ensured that an effective and fully compliant conduct of operations (COO) safety management program (SMP) has been implemented at the site.

### CRITERIA

1. The Site Office has developed and implemented processes and procedures to effectively oversee contractor performance in this functional area (DOE O 226.1A; NA-1 SD 226.1A).
2. For each nuclear facility, the Site Contractor has prepared and submitted a COO applicability matrix (or other equivalent documents) that has been approved by the Site Office Manager or designee. Each matrix is current and consistent with the commitments in the applicable documented safety analysis (DSA) (DOE O 422.1; NA-1 SD 411.1-1C).
3. Site Office procedures and mechanisms ensure that the Site Contractor has prepared implementing mechanisms for the COO SMP that meet contract requirements; the commitments in each DSA and Technical Safety Requirement (TSR); and the COO applicability documentation. The implementing mechanisms are consistent with the guidance in DOE O 422.1 and the associated Guides to Good Practices, DOE-STD-1030-96 through DOE-STD-1045-93 (10 CFR Part 830; DOE M 450.4-1; DOE O 422.1; DOE O 226.1A; NA-1 SD 226.1A).
4. Site Office procedures and mechanisms ensure that nuclear facility operations are conducted in accordance with the implementing mechanisms established to meet the expectations of COO requirements in the site contract (10 CFR Part 830; DOE O 422.1; DOE O 226.1A; NA-1 SD 226.1A).
5. Site Office procedures and mechanisms ensure that Job Hazard Analyses (JHAs) and similar hazard identification and control processes for procedures that define nuclear facility operations are formally developed in a manner consistent with the Integrated Safety Management (ISM) System Description and the appropriate Site Contractor requirements (DOE M 450.4-1; DOE O 226.1A; NA-1 SD 226.1A; ISM System Description; implementing mechanisms).
6. Site Office procedures and mechanisms ensure that the Site Contractor has conducted assessments that provide confidence that the COO SMP is effectively implemented in all nuclear facilities. The Site Contractor management assessment program periodically assesses the effectiveness of the COO SMP in each nuclear facility (DOE O 226.1A; NA-1 SD 226.1A; DOE O 422.1; 10 CFR Part 830).
7. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-

assessments) have been appropriately resolved, corrective actions have been completed and are adequate, or a clear path to completion is indicated (DOE O 226.1A; NA-1 SD 226.1A).

8. The Site Office has sufficient staff, and assigned personnel have adequate technical competence, to oversee the performance of the contractor in this functional area (NA-1 SD 411.1-1C).

## APPROACH

### References:

- 10 CFR Part 830, *Nuclear Safety Management*
- DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*
- DOE M 450.4-1, *Integrated Safety Management System Manual*
- DOE O 422.1, *Conduct of Operations*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM)*
- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*
- DOE-STD-1030-96 through DOE-STD-1045-93, *Guides to Good Practices for Conduct of Operations*

### Record Review:

- Review site contract List A/B and Standards/Requirements Identification Documents (S/RIDs) or Work Smart Standards (WSSs) and approved COO applicability documentation for each nuclear facility. Review DSAs and TSRs for selected nuclear facilities.
- Review NNSA Site Office procedures and organizational information to evaluate COO applicability documentation approval and oversight of the contractor's COO SMP.
- Review NNSA Site Office assessments and operational awareness information concerning the contractor COO SMP. Evaluate assessments and feedback and improvement mechanisms that demonstrate improvement and effectiveness of the COO SMP.
- Review the Site Office annual oversight plan and completed oversight for the routine assessment of activity-level work planning and control that also include critical review of integrated safety management core functions and their application.

### Interviews:

- Interview Site Office facility representatives and Site Office staff responsible for COO SMP documentation approval and oversight of the Site Contractor's COO SMP.
- Interview Site Office nuclear facility representatives and professional staff responsible for COO SMP oversight to determine whether Site Office oversight plans and the Contractor Assurance System has adequately institutionalized the NNSA Guidance for *Activity Level Work Planning and Control Processes for Effective Incorporation of Integrated Safety Management and Quality Assurance*, January 2006.

### Observations:

- If possible, observe Site Office oversight (other than facility representatives) of the Site Contractor's COO SMP.
- Observe facility representative oversight of the Site Contractor's COO SMP.