

LANL Waste Characterization, Reduction, and Repackaging Facility DOE ORR 7/21

MANAGEMENT (MG)

OBJECTIVE

MG.1: Functions, assignments, responsibilities, and reporting relationships (including those between the line operating organization and Environment, Safety, and Health support organizations) are clearly defined, understood, and effectively implemented, with line management responsible for safety. Personnel exhibit an awareness of public and worker safety, health, and environmental protection requirements and, through their actions, demonstrate a high priority commitment to comply with these requirements. **(CR 1 and 2)**

CRITERIA

1. The WCRR has effectively implemented the organization and management responsibilities specified in TSR 5.2. (WCRRF TSR 5.2; DOE P 450.4, 10 CFR 851)
2. Implementation of TSR 5.2 includes accurate organizational documentation that is understood and executed by the members of the organization. (TSR; DOE P 450.4, 10 CFR 851)
3. WCRR management has implemented an effective Integrated Safety Management System (ISMS) in accordance with an approved ISMS Description. Line Management is responsible for safety.
4. TRU-SO-1702, *Assignments of WCRR Managers and Supervisory Positions* meets the requirements of the TSR and has been effectively implemented and is consistent with the Laboratory commitments in the ISMS Description. (DOE P 450.4u, WCRRF TSR 5.2.1, and WCRRF TSR 5.2.2)
5. Personnel exhibit an awareness of public and worker safety, health, and environmental protection requirements and, through their actions, demonstrate a high priority commitment to comply with these requirements.

APPROACH

Document Review:

- TRU-SO-1702 or other WCRR organization documentation to verify that the requirements of the TSR have been included and that the commitments of the ISMS Description are accurately implemented.
- Employee concern program documentation.
- CORR final report and corrective action closure packages for evidence of meeting the criteria of this functional area.
- Any compensatory measures identified for WCRR in the last 6 months to ensure adequate closure.
- Management assessments for last 6 months associated with WCRR requirements management processes.
- LANL ISMS Description.

- LANL implementing mechanisms for DOE O 226.1.
- Implementing mechanisms and results of WCRRF Audits and Reviews per TSR 5.5
- Organizational charts and staffing levels.
- Previously completed evaluations by oversight groups, official review teams, audit organizations, and the operating contractor.
- Self-assessment reports conducted for the WCRR project.
- Results of the Management Assessments including the management assessment plans.
- WCRR Management Assessment Schedule.
- Status of all open and recently closed WCRR specific issues.
- Lessons learned including work packages, lessons learned from other sites, and evidence of implementation.
- Occurrence Reports.
- Feedback and improvement analysis and integrated lessons learned reports.

Interviews:

- Selected management and staff from the institutional level down to the facility level to ensure that line roles and responsibilities, environmental protection requirements, public and worker safety and health requirements, as documented in the ISM System Description, DSA or AA and implementing procedures are properly understood and implemented.
- WCRRF manager responsible for reviews and audits
- WCRR issues manager

Observations:

- Perform a facility walkthrough with WCRR line management to determine their level of commitment to comply with management responsibilities.

MG.2

OBJECTIVE

MG .2: A feedback and improvement process has been established to identify, evaluate, and resolve deficiencies and recommendations made by independent review groups, official review teams, audit organizations, and operating contractor . (CR 15)

CRITERIA

1. WCRR has an effective feedback and improvement program, including reviews and audits that meet Contractor Assurance Program expectations of DOE O 226.1. The program achieves the commitments in the approved QAP and ISMS Description and is compliant with TSR 5.5. (WCRRF TSR 5.5; DOE O 226.1; DOE P 450.4)
2. WCRR is supported by an effective issues management process or program in that all issues identified are tracked; corrective actions are developed and accomplished. This includes issues identified during WCRR construction, testing, and readiness assessment activities (DOE O 414.1C; CFR 830.120)
3. Management has reviewed all open issues related to WCRR and verified that no single open deficiency or group of deficiencies preclude safely starting nuclear operations. (10 CFR 830.120)

APPROACH

Requirements:

- DOE O 414.1C, *Quality Assurance*
- DOE O 231.1A Chg 1, *Environment, Safety, and Health Reporting*

Document Review:

- TRU-SO-1702 or other WCRR organization documentation to verify that the requirements of the TSR have been included and that the commitments of the ISMS Description are accurately implemented.
- Employee concern program documentation.
- CORR final report and corrective action closure packages for evidence of meeting the criteria of this functional area.
- Any compensatory measures identified for WCRR in the last 6 months to ensure adequate closure.
- Management assessments for last 6 months associated with WCRR requirements management processes.
- LANL ISMS Description.
- LANL implementing mechanisms for DOE O 226.1.
- Implementing mechanisms and results of WCRRF Audits and Reviews per TSR 5.5
- Organizational charts and staffing levels.
- Previously completed evaluations by oversight groups, official review teams, audit organizations, and the operating contractor.
- Self-assessment reports conducted for the WCRR project.
- Results of the Management Assessments including the management assessment plans.
- WCRR Management Assessment Schedule.
- Status of all open and recently closed WCRR specific issues.

- Lessons learned including work packages, lessons learned from other sites, and evidence of implementation.
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- Feedback and improvement analysis and integrated lessons learned reports.

Interviews:

- Selected management and staff from the institutional level down to the facility level to ensure that line roles and responsibilities, environmental protection requirements, public and worker safety and health requirements, as documented in the ISM System Description, DSA or AA and implementing procedures are properly understood and implemented.
- WCRRF manager responsible for reviews and audits
- WCRR issues manager

Observations:

Perform a facility walkthrough with WCRR line management to determine their level of commitment to comply with management responsibilities.

MG.3

OBJECTIVE

MG.3: The breadth, depth, and results of the responsible contractor Readiness Review are adequate to verify the readiness of hardware, personnel, and management programs for operation. **(CR 17)**

CRITERIA

1. The CORR implementation plan met the requirements of the approved Plan of Action (POA). (DOE O 425.1C)
2. The CORR Team members were qualified to assess the subjects and technical areas to which they were assigned. (DOE O 425.1C)
3. The CORR as documented by the final report was adequate in breadth and depth to determine the readiness of WCRRF to start nuclear operations. (DOE O 425.1C)
4. Issues, omissions, anomalies, etc identified during the CORR were properly categorized as to pre-start findings, post-start findings, or observations. (DOE O 425.1C)
5. Corrective actions to resolve CORR findings were appropriate and effective. (DOE O 452.1C)
6. Appropriate issues management processes were applied to determine the extent of the conditions and resolve the underlying causes for the findings. (DOE O 425.1C)
7. Documentation of finding resolution was adequate. (DOE O 425.1C; 10 CFR 830.120)

APPROACH

Requirement:

- DOE O 425.1C, *Startup and Restart of DOE Nuclear Facilities*

Document Review:

- CORR Plan of Action (POA)
- CORR Implementation Plan (IP)
- CORR supporting documentation
- CORR Final Report
- Final Closure packages for CORR Findings

Interviews:

- CORR Team Leader
- Selected CORR team members
- Selected WRCC Management Team members

Observations:

- Verify corrective actions for selected findings (may be accomplished as part of performance observations by other functional areas)