

	Number: EA CRAD 30-01 Revision: Rev. 1 Effective Date: 2/15/18
<b>Contractor Assurance System - Criteria and Review Approach Document</b>		
Authorization and Approval	 Director, Office of Environment, Safety and Health Assessments Date: 2/15/2018	 Director, Office of Nuclear Safety and Environmental Assessments Date: 2/14/2018

## 1.0 PURPOSE

The mission of the U.S. Department of Energy (DOE) Office of Environment, Safety and Health Assessments (EA-30) is to assess the effectiveness of safety and emergency management systems and practices used by line and contractor organizations and to provide clear, concise, rigorous, and independent evaluation reports of performance in protecting workers, the public, and the environment from the hazards associated with DOE activities.

In addition to the general independent oversight requirements and responsibilities specified in DOE Order (O) 227.1A, *Independent Oversight Program*, this criteria and review approach document (CRAD), in part, fulfills the responsibility assigned to EA in DOE Policy 226.2, *Policy for Federal Oversight and Contractor Assurance Systems* to conduct independent oversight of contractor implementation of DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*, Attachment 1, Contractor Requirements Document (CRD).

The CRADs are available to DOE line and contractor assessment personnel to aid them in developing effective DOE oversight, contractor self-assessment, and corrective action processes. The current revision of EA's CRADs are available at <http://www.energy.gov/ea/criteria-and-review-approach-documents>.

## 2.0 APPLICABILITY

The following CRAD is approved for use by the Office of Environment, Safety and Health Assessments.

### 3.0 FEEDBACK

Comments and suggestions for improvements on this CRAD can be directed to the Director, Office of Environment, Safety and Health Assessments.

### 4.0 CRITERIA AND REVIEW APPROACH

The review of the contractor assurance system (CAS) focuses on the implementation and effectiveness of the contractor in identifying, correcting, and preventing recurrence of issues that adversely impact the environment, safety, health and mission of the selected DOE site. The overall objective is to ensure the CAS is adequately controlling the work, managing risks, collecting and implementing feedback, and improving performance. This CRAD also contains an evaluation of the adequacy of Federal line oversight of the contractor's CAS as performed by the responsible DOE Field Office.

#### **OBJECTIVES**

**CAS.1: Development and Implementation of Contractor Assurance System - Site contractor management has developed and implemented a Contractor Assurance System that includes assignment of management responsibilities and accountabilities, and provides evidence to assure both DOE and the contractor's management that work is being performed safely, securely, and in compliance with all requirements; that risks are being identified and managed; and that the systems of control are effective and efficient. (DOE O 226.1B CRD 2.a)**

#### **Criteria**

1. An acceptable CAS description is documented and approved by DOE. (DOE O 226.1B CRD 2.a, c)
2. An appropriate set of requirements of the CRD are formally assigned to the subcontractors to ensure subcontractors' acceptable safety performance. (DOE O 226.1B CRD 1)
3. CAS effectively monitors and evaluates work and safety performance of contractor and subcontractor compliance with contract and facility safety requirements. (DOE O 226.1B CRD 1)
4. The scope of the CAS is appropriately expanded beyond the environment, safety, security, and health areas to include business and financial systems, and emphasizes the importance of establishing and maintaining productive relationships between contractor, Federal, and corporate parent personnel.(DOE P 226.2)
5. CAS effectively ensures that Contractor work performance meets the applicable requirements for protection of environment, safety and health, including quality assurance and integrated safety management; safeguards and security; cyber security; and emergency management. (DOE O 226.1B CRD 1)
6. Contractor management responsibilities and accountabilities are assigned and performed. (DOE O 226.1B CRD 2.a)
7. CAS adequately compiles and analyzes results of assurance processes to provide evidence of safe, secure, and compliant work. (DOE O 226.1B CRD 2.a)
8. Personnel are selected and trained for effective performance of their assigned CAS responsibilities. (DOE O 226.1B CRD 2.b(3)(b)(3))

#### Lines of Inquiry

- Does the CAS program description document (or equivalent) require and adequately describe a comprehensive and integrated set of processes and activities to identify and address program and

performance deficiencies, and opportunities for improvement; provide the means and requirements to report deficiencies to the responsible managers and authorities; establish and effectively implement corrective and preventive actions?

- Has the CAS program description document been approved by contractor management?
- Has the initial CAS description been submitted to the DOE Contracting Officer for review and approval? Is the CAS description adequately reviewed and approved by DOE?
- Does the contractor submit to DOE for annual review and approval a revised CAS program description document (or equivalent)?
- Does the CAS require monitoring and evaluation of all work performed under their contracts, including subcontractors?
- Has the contractor adequately monitored and evaluated all work performed under their contracts, including subcontractors?
- Has the contractor established adequate processes and mechanisms, such as use of corporate audits, third party certifications, or other external reviews in designing and implementing the contractor's assurance system for measuring the effectiveness of program elements?
- Does the contractor have an adequately defined process for review and communication to DOE management of situations when DOE directives or site-specific requirements conflict, are unclear, or are incomplete?
- Is DOE line management provided with unfettered access to facilities and contractor activities and to CAS data?
- Does the CAS include self-evaluations of compliance with applicable laws, regulations, national standards, DOE directives, and DOE-approved plans and program documents, site-specific procedures, manuals, criteria review and approach documents, contractual performance objectives, and other contractually mandated requirements?
- Has the contractor adequately defined the requirements for experience, knowledge, skills and abilities for personnel implementing the assurance system elements?
- Has the contractor established, maintained, and implemented appropriate qualification standards for personnel with oversight responsibilities?
- Has the contractor provided and ensured completion of appropriate training for personnel who manage and perform assurance functions, in that they must possess experience, knowledge, skills, and abilities commensurate with their responsibilities?

**CAS.2: Assessment Planning and Scheduling - Assessments are planned and conducted using a risk-informed approach to evaluate performance and determine the effectiveness of policies, programs, and procedures. (DOE O 226.1B CRD 2.b(1) and 2.b(2))**

**Criteria**

1. CAS adequately identifies and schedules a suite of assessments that vary in depth and scope based on requirements and risk. (DOE O 226.1B CRD 2.a)
2. Rigorous, risk-informed and credible self-assessment and feedback and improvement activities are performed and documented. Assessment programs are risk-informed and appropriately cover potentially high consequence activities. (DOE O 226.1B CRD 2.b(2))
3. Self-Assessments are used by the CAS at appropriate periods to evaluate performance at all levels and to determine the effectiveness of policies, requirements, and standards and the status of implementation. (DOE O 226.1B CRD 2.b(2))
  - a. Management self-assessments (also called management assessments) are effectively performed by contractor management, and are adequately developed (scope and review criteria) based on the

- nature of the facility/activity being assessed and the hazards and risks to be controlled. (DOE O 414.1D CRD Attachment 2, Criterion 9)
- b. Self-assessments appropriately focus on hands-on work and the implementation of administrative processes and involve workers, supervisors, and managers to encourage identification and resolution of deficiencies at the lowest level practicable (e.g., workplace inspections and post-job reviews). (DOE O 414.1D CRD Attachment 2, Criterion 10)
  - c. Support organizations perform effective self-assessments of their performance and the adequacy of their processes. (DOE O 414.1D CRD Attachment 2, Criterion 5)
  - d. Contractors, at all levels, effectively assess the implementation and adequacy of their processes, including analysis of the collective results of lower-level self-assessments.
  - e. Self-assessment results are documented commensurate with the significance of risks associated with activities being evaluated. (DOE O 226.1B CRD 2.b(3)(b))
  - f. Deficiencies are accurately described and documented for evaluation and correction using a formal issues management processes. (DOE O 226.1B CRD 2.b(1)(2))
4. Internal independent assessments are effectively performed by contractor organizations or personnel that have authority and independence from line management, to support unbiased evaluations. (DOE O 226.1B CRD 2.a and 2.b(1))
    - a. Assessments are formally planned and scheduled based on the risk, hazards, and the complexity of the processes and activities to be evaluated. (DOE O 226.1B CRD 2.b(2))
    - b. Independent evaluators are appropriately trained and qualified, and have adequate knowledge of the areas assessed. (DOE O 426.2 4.a)
    - c. Reviewers are dedicated contractor staff, members of external organizations, or both. (DOE O 226.1B CRD 2.b(1))
    - d. Independent assessments of individual activities and processes appropriately focus on facilities, projects, programs and management processes that are used by multiple organizations. (DOE O 226.1B CRD 2.b(1) and 2.b(2))
    - e. Internal independent assessments concentrate on effective performance through observation of work activities and the results of process implementation. (DOE O 226.1B CRD 2.b(2))
  5. CAS includes a method to validate the effectiveness of assurance system processes by using third party audits, peer reviews, independent assessments, effectiveness reviews, etc. (DOE O 226.1B CRD 2.b(1))
  6. The CAS, as a minimum expectation, has an adequate baseline assessment program that effectively evaluates the safety management programs described in the site Documented Safety Analysis (DSA). (10 CFR Part 830)

#### Lines of Inquiry

- Has the contractor established appropriate, formal processes and procedures for conducting effective self-assessments and internal independent assessments of all programs, processes, and performance of facilities, systems, and organizational elements, including subcontractors?
- Do these processes and procedures adequately detail the requirements for all types of assessment and performance measurement activities, such as management walkthroughs, surveillance and inspection activities, formal assessments and reviews, and post-job reviews?
- Have adequate guidance and support tools such as checklists, templates, and databases been provided?
- Do self-assessment processes encourage and facilitate the involvement of workers, supervisors, and managers to develop assessment skills and abilities?
- Do assessment and performance measurement program procedures provide appropriate linkages to the issues management, corrective action, and reporting processes?

- Are personnel implementing the assessment and performance measurement program processes adequately trained and qualified to perform assigned oversight activities?
- Has the contractor defined adequate requirements for experience, knowledge, skills and abilities for personnel implementing assessment and performance measurement activities?
- Are assessment and performance measurement program responsibilities appropriately implemented?
- Do assessments and performance measurement activities adequately and accurately evaluate the as-found performance conditions of the essential program elements?
- Does line management routinely monitor and observe the activities of their workforce to ensure activity, facility, and institutional requirements and management expectations are met?
- Are formal, rigorous, effective self-assessments conducted at all levels and in all organizations to determine the adequacy of programs and performance and identify deficiencies needing correction and areas and means for performance improvement?
- Are institutional programs periodically evaluated for adequacy, including assessment of implementation by line and support organizations?
- Are appropriate and effective independent assessments performed, including evaluations of assurance system effectiveness?
- Is the subject, scope, and frequency of self- and independent assessments based on a formal analysis that addresses elements such as risk; regulatory or standards based requirements; type and complexity of work activities, facilities, and conditions; past performance; trend analyses; or management concerns?
- Are planned assessments documented on an appropriate schedule that is maintained to reflect pertinent information and status (e.g., additions, completions, cancellations, and substitutions)?
- Have subcontractors implemented appropriate and effective self-assessment programs, and is the contractor's subcontractor oversight program effectively evaluating performance, providing feedback to subcontractors, and ensuring correction of process and performance deficiencies?
- Are assessment activities sufficiently performance-based, including an appropriate focus on observation of work, inspection of field conditions, review of evidence of compliant and effective performance, and effectiveness of corrective actions for previously identified deficient conditions?
- Has the contractor established processes and mechanisms, such as use of corporate audits, third party certifications, or other external reviews in designing and implementing the contractor's assurance system for measuring the effectiveness of program elements?

**CAS.3: Issues Management and Corrective Action Systems - A structured issues management is implemented which reports deficiencies, categorizes issues based on risk and potential consequences, ensures issues are effectively communicated to the responsible manager, and ensures that problems are evaluated and corrected on a timely basis. A corrective action system is established to ensure deficiencies are fully corrected and prevent recurrence. (DOE O 226.1B CRD 2.b(3))**

### **Criteria**

1. The issues management system effectively captures program and performance issues from many sources, and issues are appropriately categorized to ensure problems are evaluated, reported, and corrected (including compensatory actions when needed) on a timely basis. (DOE O 226.1B CRD 2.b(3))

2. Program and performance deficiencies, regardless of their source, are captured in a system or systems that provide for effective analysis, resolution, and tracking. Issues management must include structured processes for:
  - a. Determining the risk, significance, and priority of deficiencies. (DOE O 226.1B CRD 2b.(3)(b))
  - b. Evaluating the scope and extent of the condition or deficiency (e.g., applicability to other equipment, activities, facilities, or organizations). (DOE O 226.1B CRD 2.b(3)(a))
  - c. Determining event reportability under applicable requirements (e.g., Price-Anderson Amendments Act, Occurrence Reporting and Processing System, security incident reporting). (DOE 226.1B CRD 2.b.)
  - d. Identifying root causes (applied to all items using a graded approach based on risk). (DOE O 226.1B CRD 2.b(3)(b)(1))
  - e. Identifying and documenting suitable corrective actions and recurrence controls, based on analyses, to correct the conditions and prevent recurrence. (DOE O 226.1B CRD 2.b(3)(b)(2))
  - f. Identifying individuals/organizations responsible for implementing corrective actions.
  - g. Establishing appropriate milestones for completion of corrective actions, including consideration of significance and risk. (DOE O 226.1B CRD 2.b(3)(b)(2))
  - h. Tracking progress toward milestones such that responsible individuals and managers can ensure timely completion of actions and resolution of issues. (DOE O 226.1B CRD 2.b(3)(b)(2))
  - i. Verifying that corrective actions are fully complete.
  - j. Validating that corrective actions are effectively implemented and correct the entire extent of condition, using a graded approach based on risk. (DOE O 226.1B CRD 2.b(3)(b)(3))
  - k. Ensuring that individuals and organizations are accountable for effectively performing their assigned responsibilities. (DOE O 226.1B CRD 2.b(3)(a) and (b)(1)(2)(3)(4)(5))
  - l. Ensuring that issues are evaluated when identified for impact on the facility safety basis, including preparation of a Basis for Interim Operation (a.k.a. BIO) when necessary. (DOE O 226.1B CRD 2.b(3)(b))
3. For higher significance findings, an effective causal factor analysis/evaluation, timely actions and plans to correct and prevent reoccurrence, tracking plans and actions to closure, and performing effectiveness reviews must be completed. (DOE O 226.1B CRD 2.b(3)(b))<sup>1</sup>

#### Lines of Inquiry

- Is there a structured and effective issues management process capable of capturing issues from many sources and conducting analyses on risk significance, establishing priorities, developing resolutions and corrective actions, and tracking completion of the actions?
- Are the full extent of deficiencies in programs or performance identified during assessment activities communicated to appropriate management for resolution through a structured issues management process?
- Does the issues management process identify causes and provide effective recurrence controls?
- Are event identification, reporting and investigation responsibilities appropriately validated, documented, communicated, classified, evaluated, tracked and resolved?
- Is reporting of operational events, accidents, occupational injuries and illnesses, and nuclear safety issues conducted in accordance with applicable nuclear, security, environment, occupational safety and health, and quality assurance requirements, applicable DOE directives, and contract terms and conditions?

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<sup>1</sup> The graded implementation of these corrective action processes based on categorization of issues is anticipated to meet quality assurance and integrated safety management principles.

- Are immediate and adequate compensatory measures to operational events, accidents, occupational injuries and illnesses and nuclear safety issues sufficiently defined and taken as part of line management initial response to operational events, and in the development of follow-on corrective action plans?
- Are operational events, accidents, occupational injuries and illnesses and nuclear safety issues promptly and rigorously reported to management, documented, and investigated in accordance with formal issues management processes that identify causes, extent of condition, and recurrence controls, management and programmatic weaknesses, and the need to communicate lessons learned?
- Are operational events, accidents, occupational injuries and illnesses and nuclear safety issues properly categorized to ensure the necessary rigor of review? (E.g. if issues are categorized at too low a level, they may not meet the thresholds for more in-depth analysis such as a root cause analysis, an extent of condition evaluation, reoccurrence controls and validation / verification of closure.)
- Are corrective and preventive actions resulting from investigation of events, accidents, and occupational injuries and illnesses formally managed to completion and verified to be effective in preventing recurrence?
- Do assigned corrective actions adequately address and correct the entire extent of the problem identified?
- Is the impact on operability adequately assessed and addressed, including entry into applicable limiting conditions for operation when necessary?
- Are events, accidents, occupational injuries and illnesses, and nuclear safety issues reported to DOE and other regulatory entities in a timely and thorough manner as required by directives and regulations?
- Are operations and engineering organizations, including support organizations, appropriately involved in the identification, assessment, and development of corrective action plans of reportable events, accidents, and occupational injuries and illnesses?
- Are the processes and performance of event, accident, occupational injury and illness, and nuclear safety issue management properly evaluated for effectiveness on an appropriate frequency?

**CAS.4: Performance Metrics and Improvement - Results of the CAS are analyzed to measure performance and identify trends. The results are communicated to the management and workers, and feedback and improvement processes are effectively implemented to improve Contractor performance. (DOE O 226.1B CRD 2.b(3)(b), 2.b(4) and 2.b(5))**

#### **Criteria**

1. The CAS includes effective means of communicating issues and performance trends/analysis to managers to enable informed decisions and correction of negative performance/compliance trends. (DOE O 226.1B CRD 2.b(3)(b)(5))
2. Continuous feedback and improvement processes are established that solicit and use corrective action, worker feedback and lessons learned to improve work planning, hazards identification, program and process implementation. (DOE O 226.1B CRD 2.b(5))
3. The CAS provides timely communication of issues and performance trends to contractor management and the Contracting Officer and electronic access to assurance-related information. CAS provides evidence to assure DOE and contractor management that work is being performed safely, that risks are being identified and managed, and that control systems are effective. (DOE O 226.1B CRD 2.b(4), 2.d))

4. CAS establishes effective metrics (performance indicators) and targets, and performs trending and analysis to support appropriate, proactive decisions. (DOE O 226.1B CRD 2.b(6))

#### Lines of Inquiry

- Has the contractor established appropriate and formal processes and procedures for identifying, monitoring, analyzing data measuring the performance of facilities, programs, and organizations and for identifying and implementing needed actions and opportunities for performance improvement?
- Are the results of assurance system processes periodically and adequately analyzed and reported to DOE in support of formal contract evaluations?
- Have adequate processes, procedures, and guidance been developed to ensure an effective performance indicator program?
- Have the appropriate performance indicators and parameters been selected to effectively measure performance and identify adverse trends in a timely manner to ensure prompt mitigation and corrective actions?
- Are adequate trending analyses of events (including non-reportable incidents), accidents, and occupational injuries and illnesses performed in accordance with structured/formal processes and applicable DOE directives?
- Is the performance indicator program periodically reviewed to ensure the most appropriate sets of data and data analysis parameters are being employed?
- Is performance data being sufficiently analyzed, with appropriate conclusions drawn and presented to management? Are needed and appropriate actions to address performance issues identified and taken?
- Is the effectiveness of processes and performance measurement programs evaluated on an appropriate frequency?
- Has the performance metrics process effectively resulted in an improved CAS performance?

**CAS.5: DOE Field Element Oversight of the CAS – The DOE Field Element approved the CAS and routinely provides oversight of the Contractor’s activities and programs to ensure the CAS is adequately controlling the work, managing risks, collecting and implementing feedback, and improving performance.** (DOE O 226.1B 4.b and 5.e)

#### **Criteria**

1. DOE field element line management has established and implemented comprehensive and robust oversight processes commensurate with the level of risk, and prioritized according to the significance of potential consequences, to adequately evaluate contractor and DOE programs and management systems, including the contractor assurance system, for effectiveness of performance (including compliance with requirements). (DOE P 226.2, DOE O 226.1B 4b(1))
2. The DOE field element line oversight program includes written plans and schedules for planned assessments, focus areas for operational oversight, and reviews of the contractor’s self-assessment of processes and systems. (DOE O 226.1B 4b(2))
3. The DOE field element has an issues management process that categorizes findings commensurate with the level of risk and prioritized relevant to potential consequences, ensures relevant line management findings are effectively communicated to the contractors, and ensures that problems are evaluated and corrected on a timely basis. For issues categorized as high significance findings, the issues management process invokes a high level of rigor to prevent recurrence. (DOE O 226.1B 4b(4))



4. Oversight processes are tailored according to the effectiveness of contractor assurance systems, the hazards at the site/activity, and the degree of risk, giving additional emphasis to potentially high consequence activities. (DOE O 226.1B 4b(5))
5. DOE field element line management reviews and approves the initial contractor assurance system program description (if formally delegated, otherwise reviews and forwards to Headquarters for approval). The field element reviews and assesses the effectiveness of the Contractor Assurance System (DOE O 226.1B 5e(4))

#### Lines of Inquiry

- Has the DOE field office established and implemented an effective oversight program?
- Does the DOE field office develop and approve adequate written plans and schedules for planned oversight activities?
- Does the DOE field office have an effective issues management process?
- Does the DOE field office adequately communicate identified issues to the contractor with a request for resolution in a timely manner?
- Does the DOE field office adequately consider hazards and risk in establishing planned oversight activities and in determining significance of issues?
- Are the DOE staff who conduct oversight appropriately trained and qualified, commensurate with their responsibilities?
- Are there a sufficient number of qualified DOE facility representatives to effectively conduct oversight of the Contractor?
- Does the DOE field office adequately participate in event fact-findings and critiques, review proposed corrective action plans, and approve close-out of issues, with a level of involvement appropriate to the risk significance?
- Has the DOE field office established a formal process for adequately evaluating overall contractor performance and providing feedback to the contractor?
- Does the DOE field office periodically and adequately review the results of the CAS processes in support of formal contract evaluations?
- Does the DOE field office routinely provide formal feedback to the Contractor on the effectiveness of the Contractor's CAS?

### ***REVIEW APPROACH***

#### Record Reviews:

- CAS approvals, directives, policies, program descriptions, procedures, instructions, guidance, Quality Assurance Plan, and contractual requirements.
- Integrated Safety Management System Description and most recent declaration.
- Assessment planning, scheduling, and risk-ranking process procedures.
- Contractor assessment schedules for independent, management, and other self-assessments and external reviews/inspections for the past 3 years
- Assessment and surveillance reports or records on the CAS and safety management programs (sampling of at least 6 reports or records).
- Records of processes that verify the effectiveness of the CAS in addition to assessments.
- Charters and minutes of meetings that evaluate issues, assign actions and resources.
- Evidence that the contractor requirements flow down to subcontracts and are evaluated for effective implementation by the contractor.
- Work packages related to facility activities for incorporation of lessons learned and feedback processes.

- Documented Safety Analysis and Technical Safety Requirements descriptions and requirements for assessments, safety management programs, and administrative controls.
- Issues management system description and procedures
- Issues management database records (review while on site).
- Issues management status reports (open actions, extension history, trends).
- Corrective action program description and corrective action plans for a sampling of open issues management items (4 or more).
- Effectiveness reviews for a sampling of closed issues management items (4 or more).
- Quality Assurance Plan
- Operating Experience (OE) program description
- Lessons Learned (LL) program description
- Records of OE or LL feedback developed, submitted or distributed.
- Evidence that lessons learned are disseminated to the work force, incorporated into training, work control planning, procedure revisions, and shared during work group meetings.
- Employee concerns program description document or procedure
- Employee concerns case files
- Differing professional opinion program description or process document and records.
- Occupational injury and illness reports
- Operational incident/event reports, critique minutes and occurrence reports, including Occurrence Reporting Process System (ORPS) reports for the past 6 to 12 months
- Deficiency reports
- Causal analyses
- Verification/validation records and effectiveness determinations
- Metric process descriptions and selection of recent reports.
- Performance evaluation reports (past 2 years)
- Trend analysis and performance indicator reports and evaluations, conclusions, and any related corrective actions.
- Training records for personnel leading and performing assessments and cause analysis, cognizant system engineers.
- DOE oversight program description document
- DOE procedures for conducting assessments and surveillances
- DOE staffing analysis
- DOE training and qualification program and procedures
- DOE training records for selected oversight personnel (review while on site)
- DOE assessment and surveillance schedules (past 3 years)
- DOE Field element assessments, surveillances, and oversight involving CAS and assessment adequacy, including Integrated Safety Management System verifications, and management self-assessments (at least 6 reports or records)
- DOE issues management system description and procedures
- DOE documentation of contractor performance evaluations
- Records demonstrating DOE approval of Contractor's CAS

#### Interviews:

- CAS Manager
- Selected CAS staff
- Facility Manager(s)
- Assessors
- Cause analysts

- Facility Training Manager
- Training personnel
- Cognizant System Engineers for safety systems
- Operating experience coordinator
- Lessons learned coordinator
- Metrics coordinator or manager
- Work Control Lead/planner for the facility
- Selected facility operational and support personnel
- Subcontractor Manager
- DOE Field Office Manager or Director
- DOE Nuclear Safety Oversight Lead
- DOE Quality Assurance Manager and staff
- DOE Facility Representative(s)
- DOE Safety Systems Oversight Engineers
- DOE Performance Assurance Manager

Observations:

- Facility issues management meetings (to evaluate issue management processes, observe issue screening and indirectly evaluate organizational learning/safety culture)
- Meetings where senior management is apprised of performance results
- Ongoing assessment or review team meetings and field activities
- Event critiques
- Work activity “hot wash” or post-job meetings
- Operational demonstration of issues management system

References:

- DOE Policy 226.2, *Policy for Federal Oversight and Contractor Assurance Systems*
- DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*
- 10 CFR 830, Subpart A - *Quality Assurance Requirements*
- DOE O 450.2 Change 1, *Integrated Safety Management*
- DOE Order 414.1D Admin Change 1, *Quality Assurance*
- DOE O 210.2A, *DOE Corporate Operating Experience Program*
- DOE O 232.2A, *Occurrence Reporting and Processing of Operations Information*
- DOE G 414.1-1C CRD, *Management and Independent Assessments Guide*
- DOE O 426.2 Admin Change 1, *Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities*