



Office of Environment, Safety and Health Assessments Protocol for Oversight Activities

**PROTOCOL – EA-30-00
Revision 3**

April 2020

Office of Enterprise Assessments
U.S. Department of Energy

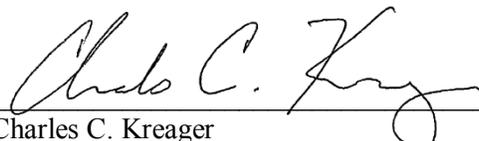
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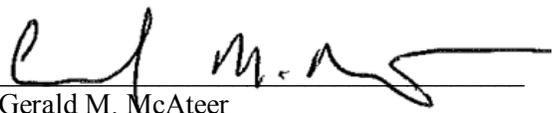
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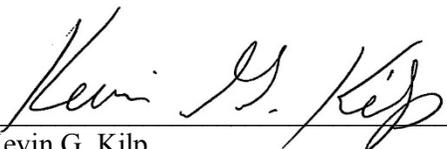
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**Office of Environment, Safety and Health Assessments
Protocol for Oversight Activities**

1.0 PURPOSE

This protocol establishes the requirements and responsibilities for conducting and managing the Office of Environment, Safety and Health Assessments (EA-30) oversight activities as required by Department of Energy (DOE) Order 227.1A, *Independent Oversight Program*. These activities, which are the primary means of gathering data to support the independent oversight function, include assessments of selected technical areas and operations; concurrent assessments, conducted in alignment with line management activities; observations of selected site meetings and operational safety-related activities; and other activities as directed by the Secretary of Energy or requested by Department line management. This protocol further discusses and categorizes these activities as assessments, studies, or operational awareness activities.

2.0 APPLICABILITY

This protocol applies to assessments, studies, and operational awareness activities conducted by EA-30 personnel. These oversight activities are typically performed by small teams. Assessments that are larger in scope, complexity, or team size may warrant additional supervision or advisory personnel, as detailed in the Office of Enterprise Assessments (EA) *Independent Oversight Program Appraisal Process Protocols*.

DOE Order 227.1A establishes the requirements and responsibilities of other DOE personnel and contractors in supporting EA independent oversight activities.

3.0 REQUIREMENTS

General

- This protocol provides the requirements and guidance for assessments, studies, and operational awareness activities. Exceptions to the requirements may be made for highly unique activities, with the approval of the EA-30 Director. Teams should use the guidance in Appendix A, or take other mitigating actions, to ensure that they perform and document high-quality, timely, value-added oversight activities. Teams should report “best practices” for oversight activities to EA-30 management for consideration in updating the protocol.
- Assessments are to be performed in accordance with DOE Order 227.1A, approved plans, and criteria and review approach documents (CRADs).
- Team members must possess technical expertise, competencies, and experience commensurate with their responsibilities and must be free of any potential conflict of interest.
- Team members receive and review available background information to facilitate the planning and performance of oversight activities.

- The Team Leader must determine, and team members must follow, site and program security requirements and limitations regarding the use of personal electronic equipment and the requirements for site computers and local area network (LAN) access, safety and security training, and personal protective equipment (PPE) pertinent to the planned activity.
- The Team Leader must determine, and team members must follow, protection requirements for classified information and controlled unclassified information (CUI) associated with the activity, including reviews of the resultant reports and documentation to ensure that they are appropriately marked.
- EA-30 oversight reports document significant and validated observations from oversight activities and appropriately identify findings and/or deficiencies consistent with DOE Order 227.1A.
- Unresolved differences in the scheduling of activities, the factual accuracy of the report, or comment resolution with the organization being reviewed are raised to the next level of management in accordance with DOE Order 227.1A. The Department’s Office of Primary Interest is consulted concerning differences in interpretations of policy.
- When a team identifies a policy concern during oversight activities, EA-30 should first discuss it with the Department’s Office of Primary Interest and may follow up with a memorandum documenting any validated concerns and recommendations.
- EA-30 uses the EA correspondence tracking system to retain assessment plans, briefing slides, closeout summaries, reports, factual accuracy comment resolution matrices supporting the accuracy of the reports, and associated executive summaries, transmittal memoranda, and field notes.
- During the EA-30 staff meeting that follows the onsite closeout of an oversight activity, the Team Leader presents a summary of the scope, the key results from the activity, lessons learned, and potential process improvements for future oversight activities. The template, *EA-30 Staff Briefing TEMPLATE*, is found in EAShare on the EA-30 page.
- EA-30 Administrative Staff enters findings into the EA-30 findings database after each assessment or operational awareness activity, and a designated lead is assigned responsibility for follow-up.
- Based on the significance of an open EA-30 finding, future oversight activities are tailored to review the timeliness and adequacy of corrective actions, verify and validate the effectiveness of the corrective actions, and confirm closure of findings.

Assessments

- Assessment activities include targeted assessments, assessments, limited-scope performance tests, and assessments performed concurrently with line or contractor oversight activities, as discussed in Appendix B.
- All assessments are conducted in accordance with an approved assessment plan developed using the EA-30 Plan Template and the EA CRADs maintained in EAShare. CRADs from DOE Guide 226.1-2A, *Federal Line Management Oversight of Department of Energy Nuclear Facilities*, may be used instead of or in addition to the EA CRADs. Deviations from this protocol or the CRADs should be identified and justified in the assessment plan.

- EA-30 provides the draft assessment plan to the DOE site/field office point of contact (POC) for review and comment, with an offer to the DOE site/field office manager for a teleconference to discuss with EA-30 management the scope of the oversight activity and provide input and other insights for future independent oversight activities.
- EA-30 accomplishes the following in coordination with the site POC before the team’s arrival to the site (a checklist for planning activities is maintained on the EA-30 Page of the EAShare site):
 - The assessment plan is approved.
 - Documentation is requested, provided, and reviewed to the extent practical.
 - Initial lines of inquiry are developed by the team.
 - Tours, interviews, and surveillances of work and training are scheduled.
 - Site counterparts (subject matter experts) are identified.
 - A team workspace is reserved and site access and information technology requirements are met and/or required training is scheduled.
 - Preliminary observations based on initial documentation reviews may be drafted for internal team discussion and validation.
 - Logistics are finalized regarding the time, location, and attendees for daily, entrance, and exit meetings.
- The cognizant EA-30 office director receives periodic briefings on progress, initial results, conditions that could impede the assessment, and any need for significant changes in planned activities (which may require more frequent notification).
- EA-30 plans and schedules an entrance meeting to be held after the team arrives at the site. Invitees should include the DOE site/field office manager, contractor management representatives, primary contacts, and counterparts. The agenda should include an overview of the team’s plans, team introductions, and confirmation of assessment activities (e.g., surveillances of training and planned work and interviews).
- The team conducts periodic briefings (typically daily) with site representatives to discuss overall status and preliminary observations. To maximize transparency and effective communication, these briefings are typically aligned with team meetings.
- For concurrent assessments, EA-30 coordinates its site briefings with other review officials. For concurrent assessments with the site/field office or other entities such as DOE headquarters program reviews or external reviews, the Team Leader ensures that interface protocols are clearly articulated for effective data gathering and communications to maintain independence and to preclude interference with the concurrent assessment team.
- While at the site, team members should discuss with their counterparts at the site the scope, the team’s data and observations, and potential findings or deficiencies.
- The team conducts a final outbrief with senior DOE site and contractor managers to summarize the scope of the assessment and the team’s overall preliminary results, focusing on preliminary positive observations and significant preliminary negative observations including any identified potential findings and/or deficiencies and opportunities for improvement (OFIs). Concluding statements should present the schedule for the site’s factual accuracy review and EA-30’s resolution of the site’s comments on the draft report. A closeout summary of the key results, assessed by EA-30

management, should be provided to the senior DOE site and contractor managers at the outbrief. A template for this summary is maintained on the EA-30 Page of the EAShare site.

- The Team Leader works with the EA-30 Admin Team who will work with EA-1 Administrative Staff to schedule a 30-minute back-brief meeting with EA leadership to highlight their work and share their observations the week after the final week onsite. The back-brief meeting should provide an informal, high-level summary of the assessment, a description of the results, and “recommendations” that are likely to be included in the subsequent report.
- The closeout summary for the final outbrief is provided via the cognizant EA-30 Office Director to the EA-30 Deputy Director to forward to the Director, EA. The outbrief closeout summary is also provided to the EA-30 Admin Team for entry into DocShare.
- EA-30 documents the results of the assessment in a report issued by the EA-30 Director. Templates for EA-30 oversight reports are maintained on the EA-30 Page of the EAShare site.
 - Negative observations identified during oversight activities should be reviewed, and some may be categorized as findings or deficiencies consistent with DOE Order 227.1A. During the analysis and report development phase of the assessment, the categorization of negative observations may be adjusted as existing and new information is reviewed. The DOE site/field office must be informed of significant changes, including the categorization of findings and deficiencies that are adjusted after the outbrief, as early as possible before the transmittal of the draft report to the site for factual accuracy comments.
 - The Team Leader provides the draft report to the EA Lead Technical Report Advisor, the cognizant EA-30 office director, and the EA-30 Deputy Director, who provide a quality review of the draft report against the guidance in the EA-30 report template and guidance document. The EA Lead Technical Report Advisor coordinates with the EA editors for the upcoming technical edit of the draft report.
 - The Team Leader resolves edits/comments from the EA Lead Technical Report Advisor, the cognizant EA-30 office director, and the EA-30 Deputy Director. A redline strikeout that documents the resolutions of these edits/comments as well as a clean copy of the draft report are provided to the cognizant EA-30 office director and EA-30 Deputy Director for review. The EA-30 Deputy Director, in consultation with the cognizant EA-30 office director, will determine if the draft report is to be sent to both technical editing and site factual accuracy review in parallel, or if technical editing needs to be completed before the site factual accuracy review.
 - If technical editing is done prior to site factual accuracy review, the Team Leader resolves technical editing edits/comments, and the revised draft report is provided to the cognizant EA-30 office director and EA-30 Deputy Director for review, and once reviewed the document will be sent back to the Team Leader for release to the DOE site/field office POC for factual accuracy review.
 - Comments from the DOE site/field office and their resolution are tracked in a comment resolution matrix. A template for the comment resolution matrix is maintained on the EA-30 Page of the EAShare site.

- The report is submitted to the EA-30 Director for review and approval for submittal to the Quality Review Board (QRB).
 - Team leaders determine team membership attendance at QRBs.
 - A QRB meeting is conducted for the assessment report.
 - QRB comments are resolved by attendees in an open and constructive manner recognizing the value of differences of opinion.
 - Upon resolution of the QRB comments (if any), the report and corresponding memorandum for issue and distribution is entered into the EA correspondence tracking system for review and approval.
 - EA-30 provides the cognizant Program Secretarial Officer the opportunity to submit a written management response to the conclusions and any recommendations in the final draft assessment report. If such a response is received, EA will reflect this response in an appendix to the final report.
- The associated DOE line organization receives a copy of the final report as an attachment to a transmittal memorandum from the Director, EA-30. The line management organization is responsible for evaluating, addressing, and following up on the results in accordance with the DOE line organization issues management procedures and DOE Order 227.1A.

Studies

A study may be conducted instead of an assessment to focus on the identification of best practices. A study is planned and executed in the same way as an assessment except that:

- Objectives and lines of inquiry (OLOIs) are established for studies, instead of using requirement-based CRADs.
- The team identifies and communicates best practices, along with observations on compliance with requirements or the adequacy of a process or product.
- The results of a study conducted at multiple sites may be documented in field notes for each site, instead of a report, when a separate summary report is to be issued.

Operational Awareness Activities

- Operational awareness activities are site visits typically conducted to obtain insights into site operations and activities, follow up on site issues, tour facilities, meet or interview personnel, and/or attend key meetings.
- The scope and duration of site visits for operational awareness activities should be coordinated with the DOE site/field office and EA-30 management in advance.

- An entrance brief or teleconference should be offered to the DOE site/field office POC to review the scope and schedule of the operational awareness activity and to meet onsite logistical needs (e.g., an access badge and dosimetry).
- An outbrief is conducted to discuss preliminary positive observations, significant preliminary negative observations and/or identified potential findings, deficiencies, and OFIs with DOE site/field office and contractor management. If no significant negative observations are identified, the outbrief may be conducted with the DOE site/field office POC. The outbrief closeout summary is provided via the cognizant EA-30 Office Director to the EA-30 Deputy Director to forward to the Director, EA. The outbrief closeout summary is also provided to the EA-30 Admin Team for entry into DocShare.
- Operational awareness activities are documented in field notes or, in special cases as directed by the EA-30 Director, in assessment reports. Operational awareness results that include findings, deficiencies, OFIs, and other significant feedback for the site should be documented in an assessment report. If there are no findings, OFIs, or significant feedback, the conduct of the operational awareness activity may be documented in a field note. The templates for field notes and assessment reports are maintained in EAShare.
- The field note is provided to the cognizant EA-30 office director and EA-30 Deputy Director for review and release to the DOE site/field office POC for factual accuracy review.
- The DOE site/field office POC provides factual accuracy verification of field notes before being finalized by EA management. The revised field note is provided to the cognizant EA-30 office director and EA-30 Deputy Director for review and release for entry into the EA correspondence tracking system.
- Field notes do not require formal management approval in the EA correspondence tracking system.
- Finalized field notes are retained in the Master Document Library (MDL) in EAShare.

4.0 RESPONSIBILITIES

Director, Office of Enterprise Assessments

- Approves assessment reports.
- Issues correspondence to DOE Program Secretarial Officers.

Deputy Director, Office of Enterprise Assessments

- Chairs QRBs and concurs in the resultant reports via the EA correspondence tracking system.
- Provides the cognizant Program Secretarial Officer the opportunity to submit a written management response to the conclusions and any recommendations included in the final draft assessment report.

Director, Office of Environment, Safety and Health Assessments

- Ensures quality through review and approval of protocols and plans for EA-30 assessments.
- Delegates authority to the Team Leader to provide day-to-day guidance to team members (including contractor personnel per the EA Business Policy – Support Services Contract Management) to implement the assessment plan’s approved scope, schedule, and level of effort.
- Reviews and approves reports for submittal to the quality review board (QRB) and prior to submittal for EA-1 review/approval.
- Provides a final quality check prior to approval of the report transmittal memorandum delivering the report to the responsible Federal site/field office or project manager (or designee).
- Works with line management to resolve any differences regarding the schedule of activities or the factual accuracy of the assessment or findings that cannot be resolved by the cognizant EA-30 office directors. Differences that cannot be resolved are raised to the Director, EA (per DOE Order 227.1A).
- Prioritizes resources for assessments, operational awareness activities, and other mission support activities as the technical monitor (per the EA Business Policy – Support Services Contract Management).
- Facilitates organizational learning from assessment activities:
 - Seeks feedback from line organization managers on EA-30 oversight activities
 - Spends time in the field with EA-30 staff and teams for coaching and awareness
 - Establishes employee-led teams for oversight activity improvement initiatives.
- Facilitates EA-30 presentations to external stakeholders on oversight activities, including:
 - Periodic briefings to Headquarters program managers
 - Requested briefings to senior Department leadership
 - Requested external briefings to such organizations as the Defense Nuclear Facilities Safety Board, Congressional representatives, and other stakeholders.

Deputy Director, Office of Environment, Safety and Health Assessments

- Reviews draft assessment reports and field notes prior to release to technical editing, DOE site/field office factual accuracy reviews, the QRB, and entry into the EA correspondence system.
- Approves field notes.
- Facilitates organizational learning from assessment activities:
 - Seeks feedback from line organization managers on EA-30 oversight activities
 - Spends time in the field with EA-30 staff and teams for coaching and awareness
 - Establishes employee-led teams for oversight activity improvement initiatives.

Directors, Office of Nuclear Safety and Environmental Assessments, Office of Worker Safety and Health Assessments, and Office of Emergency Management Assessments

- Assign appropriate technical staff to perform oversight and operational awareness activities.
- Ensure that team members possess qualifications, competencies, and experience commensurate with their assignments and are free of any potential conflict of interest.
- Approve CRADs and OLOIs within their area of cognizance.
- Accept, amend, or reject the formal assessment plans proposed by Team Leaders in their area of cognizance.
- Accept or amend the work priorities of assigned personnel and take action as necessary to meet or revise approved assessment plans and scheduled operational awareness activities.
- Distribute the closeout summaries for oversight activities and studies to the EA-30 Director and Deputy Director and the EA Director and Deputy Director.
- Accept, amend, or reject the draft report, with the concurrence of the EA-30 Deputy Director, for transmittal by the Team Leader to the DOE site/field office POC to review for factual accuracy and CUI.
- Take action as necessary to ensure adequate resolution of comments from the DOE site/field office.
- Accept, amend, or reject assessment reports and studies for submittal and take action as necessary to ensure quality.
- Participate in the QRB for reports under their cognizance and concur in the resultant report via the EA correspondence tracking system.
- Resolve any differences regarding schedules of activities or the factual accuracy of the assessment and/or findings that arise with line management and cannot be resolved by Team Leaders. When differences cannot be resolved, raise them to the EA-30 Deputy Director and/or Director.
- Evaluate feedback and lessons learned from oversight activities for process improvements.
- Assign lead(s) for closing findings in the findings database.

Team Leader

Detailed guidance and the nominal timeline for accomplishing these responsibilities are in Appendix A.

- Acquires background information pertinent to the oversight activity and disseminates it to assigned team members to support planning consistent with operational and schedule constraints.
- Leads the development, implementation, and revision (as necessary) of the assessment plan and the corresponding data collection plans developed by the assigned team members; provides day-to-day

guidance and tasks to team members to complete the assessment or study per the scope, schedule, and level of effort in the approved assessment plan.

- Coordinates increases in the level of effort needed (e.g., overtime and additional personnel) with the EA-30 Director and EA-30 contractor management.
- Coordinates with the DOE site/field office POC to provide assigned team members with the site and program security information and security limitations on use of personal electronic equipment, requirements for site computers and LAN access, safety and security training, and PPE. Identifies and communicates to team members the protection requirements for classified information and CUI associated with the activity.
- Leads the onsite entrance, daily, and exit meetings for the activity.
- Provides the outbrief closeout summary via the cognizant EA-30 office director to the EA-30 Deputy Director.
- Provides periodic status briefings and the closeout summary to the cognizant EA-30 office director, the DOE site/field office POC, and the contractor POC.
- Communicates major vulnerabilities or imminent-danger conditions to the DOE site/field office manager and cognizant EA-30 office director (per DOE Order 227.1A).
- Briefs EA-30 personnel on the key results and lessons learned during the staff meeting following each onsite oversight activity.
- Leads the development of the report in accordance with the EA-30 report template and guidance document and/or approved special assessment format to ensure overall quality and conformance to the plan and template, including the consolidation of input from other involved team members and the resolution of comments and recommendations resulting from the site's factual accuracy and classification reviews.
- Coordinates with the EA-30 Lead Technical Report Advisor for quality review and technical editing services.
- Monitors the status of report development and recommends action to the cognizant EA-30 office director as necessary to meet the:
 - schedule, as stated in the assessment plan, for the factual accuracy review by the DOE site/field office and the review by the QRB
 - EA report completion performance goals.
- Coordinates with the EA-30 administrative staff for scheduling the QRB a minimum of three weeks before anticipated QRB date.
- Submits report to cognizant EA-30 office director and administrative staff for submission to the QRB.
- Represents the team's assessment, findings, and recommendations to the QRB and resolves QRB comments.

- When differences regarding the factual accuracy of the assessment and/or findings arise that cannot be resolved, raises the issues to the cognizant EA-30 office director and the Office of Primary Interest as warranted.
- Drafts the report transmittal memorandum using the appropriate template located in the EA-30 Page in the EAShare site.
- Works with cognizant EA-30 management to designate a lead to follow-up on each finding.
- Works with administrative staff to enter findings from the oversight activity into the EA-30 database.

Team Members

Detailed guidance and the nominal timeline for accomplishing these responsibilities are in Appendix A.

- Review the provided background information to plan onsite activities and generate and update a data collection plan for assigned activities or area(s).
- Comply with site and program security requirements and limitations on use of personal electronic equipment, site computer equipment and LAN access, training, and PPE, with a goal of minimizing any negative impact on the time available to perform assigned activities.
- Protect classified information and CUI.
- Conduct assessment activities in accordance with schedules to ensure completion of assigned plan criteria.
- Inform the Team Leader promptly if circumstances impede or prevent completion of assigned plan criteria. Include recommendations for resolution.
- Provide daily input for team meetings and the outbrief meeting.
- Keep assigned site counterparts informed of schedules and observations.
- Provide input for assessment reports on assigned criteria that ensures quality and conformance to the plan, template, and schedule.
- Brief significant observations and opportunities for improvement as directed by the Team Leader.
- Peer review other team members' work as directed by the Team Leader.
- Recommend categorization of results consistent with DOE Order 227.1A.
- Support resolution of EA-30, DOE site contractor, and program office comments and recommendations, including those resulting from the factual accuracy review.
- Provide the Team Leader with lessons learned and potential process improvements for future assessment activities.

Site Lead (assigned to nuclear facilities)

- Supports Team Leaders as requested.
- As requested, in support of the Team Leader, identifies the appropriate DOE site/field office POC for approved assessment activities.

Administrative Staff

- Supports the Team Leader as follows:
 - Prepares electronic media of documents provided by the site for team members, forwarding them to each team member via express mail.
 - Interfaces with the team while on site to provide administrative support as needed, and provide express labels for shipment of documents and data from the onsite location to team members' offices.
 - Enters the onsite activities in the EA-30 On-site Calendar, the EA Weekly, and Report Tracker in EAShare.
 - Updates milestones for each onsite activity in Report Tracker in EAShare as they occur.
 - Coordinates scheduling the QRB with the Executive Assistant to the QRB Chair at the request of the Team Leader and approval of the EA-30 Director.
 - Enters the report and associated documents into the EA correspondence tracking system for management review and approval. (For assessment reports, the transmittal (tx) memorandum, and factual accuracy validation matrix are required; for field notes, the tx memorandum is not required.)
 - Develops the email distribution list for the distribution of the report from the tx memorandum for the corresponding report.
 - Coordinates posting of the report on the EA website two to three days after electronic distribution of the report. (Note: Field notes do not get posted to the EA website.)
 - Facilitates updates to the Findings Matrix Database.
 - Enters documents pertaining to the onsite activity into the EAShare MDL, such as the final Word version and signed pdf version of the assessment plan, CRADS, Protocols, inbrief meeting slides, outbrief slides or notes, factual accuracy validation matrix, reports, transmittal memorandums, field notes (Note: A transmittal memorandum is not needed for field notes), and any other documentation associated with the onsite activity. (Please also see the *Checklist for Creating DocShare Folder* in the EAShare Templates found on the EA-30 Page in the EAShare site.)

EA Lead Technical Report Advisor

- Recommends changes to the Team Leader for the assessment. Works with Team Leaders and report section writers to ensure that reports are consistent with the EA-30 report template and guidance document or approved special assessment report format.
- Performs a quality review of reports against the EA-30 report template and guidance document and provides the Team Leader with editorial enhancements to improve report clarity. If the Team Leader approves, the report review can be conducted during the peer review phase of report development, thereby possibly minimizing delays in the final technical edit. Additionally, the initial quality review can be performed on individual sections of a report, at the Team Leader's discretion.

- Coordinates EA-30 technical edits through the EA editors once the Team Leader has determined that the report is ready for a formal quality review. If the report is received for final technical edit but contains significant deviations from the EA-30 report template and guidance document, editorial comments and recommendations will be developed and provided to the Team Leader for concurrence before forwarding for final quality review and technical edit.

5.0 REFERENCES

- DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*
- DOE Order 414.1D, *Quality Assurance*
- DOE Order 227.1A, *Independent Oversight Program*
- DOE Guide 226.1-2A, *Federal Line Management Oversight of Department of Energy Nuclear Facilities*
- EA Business Policy – Support Services Contract Management, Rev. 0, dated March 23, 2015

6.0 APPENDICES

- A. Small Team Oversight Activities and Schedule
- B. Types of Small Team Oversight Activities
- C. Involvement of Augmentees in EA Assessment Activities

APPENDIX A
Small Team Oversight Activities and Schedule

This appendix documents the best practices for effectively assessing and documenting typical oversight activities in a timely manner. Team Leaders should follow this guidance and timeline, proactively schedule tasks earlier, or identify other mitigating actions with available resources to ensure the performance and documentation of high-quality, timely, value-added assessments. Team Leaders should report to their EA-30 director other practices identified for consideration in the next revision of this protocol.

Oversight Activity Planning: Thorough planning is key to obtaining and analyzing the large amounts of information from many sources needed to provide objective, timely, comprehensive, value-added assessments. While the level of effort needed for planning different oversight activities varies with the scope, depth, constraints, and/or complexity of the assessment, the essential elements of planning discussed below remain the same.

<p>Six to 10 weeks before the last day onsite for oversight activity (depending on the oversight activity’s scope, depth, constraints, and complexity)</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> ▪ Contacts the affected site and organization(s) to begin ongoing coordination and development of the assessment plan for the oversight activity. ▪ Validates the tentative scope and focus of the oversight activity. (The scope and focus for the oversight activity established in the annual plan for oversight activities should be validated based on the recent performance and status of work at the site.) This validation and coordination with DOE site office and contractor personnel may be facilitated by the Team Leader visiting the site during a scoping visit. Additionally, the Team Leader should offer the DOE site/field office manager a teleconference with EA-30 management, the Team Leader, and the EA-30 site lead (participation is optional) to discuss aspects of the oversight activity that the site/field office manager would consider valuable. ▪ Identifies and assigns personnel to review specific functional areas, locations, and/or departments. The availability of augmentees should be considered in establishing the team, in accordance with Appendix C. ▪ Finalizes the schedule for the data collection visit(s).
<p>Four to six weeks before the last day onsite for the oversight activity</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> ▪ Identifies and satisfies the team’s logistics needs, such as an onsite workspace, computer and other equipment support, PPE and security requirements, and access authorizations and training. ▪ Obtains and distributes documents and other information for more detailed planning (e.g., reports from previous oversight activities, operational awareness activities, the site contractor’s and DOE site/field office’s assessments, Occurrence Reporting and Processing System reports, and lists of high-risk work completed and/or planned). ▪ Leads team planning meetings or teleconferences. ▪ Issues the formal assessment plan, which includes the initial document request list, for the oversight activity. <p><u>Team Members:</u></p> <ul style="list-style-type: none"> ▪ Review the objectives and proposed scope of the oversight activity, and any management guidance and expectations. ▪ Become familiar with the results of previous activities and the CRADs for their assigned area(s).

	<ul style="list-style-type: none"> Review and analyze the initial available documentation and propose to the Team Leader data collection plans to assess their assigned areas using the CRADs.
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Data Collection and Assessment (with informal validation of facts): Team members typically begin providing full-time support for the oversight activity during this phase of the oversight activity. The level of effort expected for each team member in the few weeks preceding the oversight activity should be discussed with the cognizant EA-30 director and, if necessary, approved by EA-30 management.

<p>Within three weeks before the last day onsite for the oversight activity</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> Ensures that team members receive and review the initial data or information per their proposed data collection plans. Informs the cognizant EA-30 office director as needed (e.g., weekly) of the status of the team’s assessment and any significant changes to the formal plan for the oversight activity. Schedules the entrance and exit meetings with the DOE site/field office and contractor management. Schedules daily internal team meetings (if warranted) and meetings between the team and the DOE site/field office and contractor POCs for the period when the team is on site for the oversight activity. <p><u>Team Members:</u></p> <ul style="list-style-type: none"> Review the initial data and information and revise their data collection plans as warranted (e.g., to include additional data collection activities, such as reviewing additional documentation, conducting interviews on site, observing work, touring facilities) to assess performance in their assigned areas. Periodically discuss significant observations with the Team Leader. Provide a written summary of their observations identified to date for the lead technical writer’s (if assigned) and the Team Leader’s review no later than the Wednesday before the final onsite data collection and validation period for the oversight activity. Provide the Team Leader, by the Wednesday before the final onsite data collection and validation period, a list of any additional data collection activities that need to be scheduled.
<p>During the planning and initial onsite data collection visit, if used (this data collection visit normally lasts a week, occurring one to three weeks before the final onsite data collection and validation period for the oversight activity)</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> Leads an entrance meeting, if desired by the DOE site/field office, and team meetings with DOE site/field office and contractor POCs, as warranted, to expedite data collection and analysis. <p><u>Team Members:</u></p> <ul style="list-style-type: none"> Execute and revise, as necessary, their data collection plans. Meet with site counterparts to discuss data collection needs and any preliminary observations identified during the initial document reviews. Update the Team Leader on assessment results during team meetings.

<p>During the final onsite data collection and validation period for the oversight activity</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> ▪ Leads internal team meetings (if warranted), daily meetings with the DOE site/field office and contractor POCs, and the final outbrief with senior DOE site/field office and contractor management. ▪ Summarizes the status of the team’s assessment and any significant observations, potential findings, and/or deficiencies with the cognizant EA-30 director as needed. ▪ Meets with DOE site/field office and contractor management to discuss significant observations as they are developed and any conditions impeding the team’s assessment. In some cases it may be necessary to delay the full identification of findings or deficiencies until after the team has left the site. If the list of potential findings or deficiencies identified during the closeout differs from the list in the draft report, the Team Leader must inform the DOE site/field office POC of the latest results as soon as possible. ▪ Conducts a final outbrief with the DOE site/field office and contractor. <p><u>Lead Team Technical Writer</u> <i>(if assigned; otherwise these tasks are performed by the Team Leader or team members as directed):</i></p> <ul style="list-style-type: none"> ▪ Identifies and coordinates the review of findings and deficiencies that may exist in areas assigned to multiple team members. ▪ Reviews the preliminary positive observations, significant preliminary negative observations and/or identified potential findings, OFIs, and portions of the closeout summary being developed by the team members. ▪ Develops the closeout summary of key results to be reviewed by EA-30 management before being provided to the senior DOE site/field office and contractor managers during the final outbrief. <p><u>Team Members:</u></p> <ul style="list-style-type: none"> ▪ Discuss the facts and significance of preliminary positive observations, significant preliminary negative observations and/or identified potential findings, trends, and OFIs with their site counterparts or POCs before the daily team meetings. ▪ Brief, as directed by the Team Leader, preliminary positive observations, significant preliminary negative observations, and/or identified potential findings in their areas of responsibility at the daily team meetings with the DOE site/field office and contractor POCs. ▪ Provide the key results for the closeout summary for the lead technical writer’s (if assigned) or the Team Leader’s review by the deadline established by the Team Leader. ▪ Provide their portions of the report for the lead technical writer’s (if assigned) or Team Leader’s review, on a schedule that does not interfere with their data collection plan or their input for the closeout summary. ▪ Review the portions of the report written by their peers as requested by the Team Leader.
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Oversight Activity Reporting (including formal validation): The assessment report should be provided to the DOE site/field office for factual accuracy review and the QRB per the schedule in the assessment plan. The

resultant report should be provided to the Director, EA, for approval via the EA correspondence tracking system within the EA report writing performance goal. The nominal timeline for these actions follows.

<p>Within one week of leaving the site after the oversight activity</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> ▪ Summarizes key results from the oversight activity and discusses lessons learned and potential process improvements for future oversight activities at the next staff meeting. <p><u>Team Members:</u></p> <ul style="list-style-type: none"> ▪ Provide their final edits for their portions of the report to the lead technical writer (if assigned) and Team Leader. ▪ Provide the Team Leader any lessons learned or potential process improvements for future oversight activities. ▪ Provide peer review of portions of the report when requested by the Team Leader.
<p>Within two weeks of leaving the site after the oversight activity</p>	<p><u>Team Leader and the Lead Team Technical Writer (if assigned):</u></p> <ul style="list-style-type: none"> ▪ Review the final edits provided by the team members on their portions of the report. <p><u>Team Members:</u></p> <ul style="list-style-type: none"> ▪ Resolve any comments received from the Team Leader or the lead technical writer. ▪ Peer review other portions of the report as directed by the Team Leader.
<p>Within three weeks of leaving the site after the oversight activity</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> ▪ Compiles the report with the lead technical writer (if assigned). ▪ Provides the consolidated report to the cognizant EA-30 office director for review. ▪ Obtains agreement from the cognizant EA-30 office director on the timeline for: <ul style="list-style-type: none"> • Submitting findings to the EA-30 functional area lead and/or the DOE Office of Primary Interest, as appropriate • Submitting the report into the quality review and technical editing processes • Scheduling the review of the report by the QRB • Sending the report to the site for a factual accuracy review by the DOE site office and to an authorized derivative classifier at the site to support releasing the report to the public (request completion of their reviews within 10 working days).
<p>Within five weeks of leaving the site after the oversight activity</p>	<p><u>Lead Team Technical Writer (if assigned):</u></p> <ul style="list-style-type: none"> ▪ Addresses comments from the technical editing review process.

	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> ▪ Discusses the resolution of comments from the DOE site/field office and contractor with the cognizant EA-30 office director. ▪ Submits the report to the EA-30 Deputy Director for review. ▪ After the Deputy Director’s review, submits a clean version of the report to the EA-30 administrative staff for distribution to the QRB members (QRB members are to receive it at least 48 business hours prior to the scheduled QRB).
<p>Within six weeks after leaving the site</p>	<p><u>The Team Leader:</u></p> <ul style="list-style-type: none"> ▪ Briefs the QRB on the oversight activity and comments from the DOE site/field office and contractor. ▪ Resolves any QRB comments and maintains a markup of changes based on QRB comments. ▪ Resolves any DOE site/field office and contractor comments in a comment resolution matrix. ▪ Submits a clean version of the report to the EA-30 administrative staff and all comment resolution matrices for inclusion in the EA correspondence tracking system.

The Team Leader should continue to monitor the progress of the report in the EA correspondence tracking system and recommend actions to the cognizant EA-30 office director if the report issuance process is unexpectedly delayed.

APPENDIX B Types of Small Team Oversight Activities

Targeted assessments constitute an established program of reviews across the DOE complex that EA chooses to perform based on input from various sources, such as the Nuclear Safety Coordinating Committee, that consider complex-wide information. Topics for targeted assessments are identified in a memorandum and are systematically and formally planned, executed, and reported according to a documented review plan. Targeted assessments are conducted at multiple sites across the DOE complex, with the participation of one or more EA-30 personnel (for consistency), and may include a separate summary report documenting complex-wide results, in addition to oversight assessment reports for individual sites.

Assessments are formal oversight activities that are identified in approved EA-30 schedules and are systematically and formally planned, executed, and reported according to a documented assessment plan. Two different approaches are commonly used in assessments: compliance and performance-based. Compliance assessments focus on verifying a site's compliance with requirements through its implementation of procedures, and they begin with a determination of the contractual and regulatory requirements governing the assessed organization. Performance-based assessments focus first on the adequacy of the process that produced a product or service, and then on the product itself. If problems are found in the product or work processes, the assessor evaluates the methods and procedures the site used in implementing the applicable requirements, in order to find the failure that led to the identified problems. In performance-based assessments, the emphasis is on getting the full story on a problem before coming to a conclusion.

Concurrent assessments are either targeted assessments or assessments that EA-30 conducts concurrently with site office or contractor assessment activities. Concurrent assessments typically include additional areas of focus to supplement the site assessments and cover any gaps that EA-30 has identified in site/field office and contractor activities (e.g., additional criteria related to the line management oversight activity may be included, such as follow-up on findings or other concerns). Although performed concurrently, these EA-30 assessment activities are independent and are documented separately from the other organizations' or teams' assessment activities.

Limited-scope performance tests (LSPTs) use performance tests as a data collection tool for evaluating emergency management programs. They complement other data collection activities, such as interviews and document reviews. LSPTs are performance tests designed to provide insight into the adequacy of response planning, responders' abilities in implementing required actions, and decision-making capabilities associated with specific situations or types of situations. LSPTs test one or more parts of the emergency response and must be carefully conducted to ensure that they provide a valid indication of emergency response organization (ERO) performance (e.g., that the performance is not unduly affected by the limitations of the scenario and scope of participation of the ERO).

Studies are performed to identify the most effective changes made in response to a significant event or combination of concerns that warrant dissemination throughout a site and/or the DOE complex. The review plan for each study establishes the objectives and lines of inquiry for assessors to use when collecting and analyzing changes to identify best practices (instead of using CRADs, which focus on verifying compliance with DOE requirements). A study, therefore, disseminates best practices instead of documenting compliance with requirements or the adequacy of a process or product. The results of a study conducted at multiple sites are documented either in a report or in field notes for each site with a separate summary report.

APPENDIX C

Involvement of Augmentees in EA Assessment Activities

1.0 PURPOSE

Augmentees are any individuals from outside the EA organization who are selected to participate in EA assessment activities as team members in order to provide particular skills or make up for a staff shortage. This appendix provides further guidance on the involvement of augmentees in EA assessment activities.

2.0 APPLICABILITY

This protocol applies to assessment activities coordinated by EA-30 personnel. Section 4.a.6 of DOE Order 227.1A, *Independent Oversight Program*, states that “EA will encourage and accommodate appraisal augmentees from other organizations whenever feasible.”

3.0 REQUIREMENTS

General

Although there are benefits to having augmentee involvement in EA assessment activities, the Team Leader should give due consideration to the ability of an augmentee to effectively perform his or her assigned tasks. The following items must be considered when including augmentees in EA assessment activities:

- Independence from the sites/organizations being assessed
- Level of knowledge, skills, and abilities for all aspects of the assessment process
- Familiarity with EA protocols, including assessment preparation activities, document reviews, field activities, report writing, and issue significance determinations
- Knowledge, experience, and qualifications in the technical area(s) being assessed, including aspects of program-specific requirements and field implementation practices
- Understanding of EA’s roles and responsibilities under DOE Order 227.1A when conducting independent assessment activities to ensure that Departmental sites and operations appropriately protect workers, the public, and the environment from relevant hazards
- Writing skills and ability such that the assessment process can be effectively documented
- Availability and commitment to work on the full range of assessment activities to ensure that there are no distractions from the augmentee’s normal work assignments
- Security clearance level required to gain access to the facility being assessed and/or relevant data sources
- Clear understanding of travel costs and source of funding for the assessment activity, whether it is EA or the augmentee’s organization.

In addition to the assessment planning process described in Appendix A of this protocol, the following steps should be followed to encourage and accommodate participation of augmentees in EA assessment activities. Sufficient time should be allocated to make the necessary arrangements for augmentee participation in assessment activities.

- During the planning process for an EA assessment activity, identify whether augmentee participation could provide value to EA and/or other sites/organizations.
- If the need for an augmentee is recognized, identify personnel with the appropriate experience, qualification, and availability to participate in the EA assessment activity.

- Discuss the proposed EA assessment activity and augmentee involvement with EA management and, if approval for an augmentee is granted, then discuss the proposed assessment with the potential augmentee and his or her management.
- Once approved, fully integrate augmentees into the assessment team to enable maximum participation in the assessment activity.

Examples of potential augmentees in EA assessment activities include the following:

- Individuals who have previously been involved in EA assessment activities
- Individuals from DOE sites and organizations such as site offices and program offices
- Individuals qualified under various Functional Area Qualification Standards maintained by the National Training Center (EA-50)
- Individuals involved with the Energy Facility Contractors Group (EFCOG).

4.0 RESPONSIBILITIES

Director and Deputy Director, Office of Environment, Safety and Health Assessments (EA-30)

- Provide guidance to staff on encouraging augmentee involvement in assessment activities when appropriate
- Provide concurrence or non-concurrence to the Team Leader when a proposed augmentee has been identified for an assessment activity
- Work with line management from other sites/organizations to resolve any organizational or budgetary issues with augmentee involvement in assessment activities
- Provide feedback (typically in the form of a memorandum) to the augmentee's management on augmentee performance in the assessment activity.

Directors, Office of Nuclear Safety and Environmental Assessments (EA-31), Office of Worker Safety and Health Assessments (EA-32), and Office of Emergency Management Assessments (EA-33)

- Ensure that DOE directives are being appropriately followed, including the relevant section of DOE Order 227.1A that encourages augmentee participation in assessment activities
- Provide guidance to Team Leaders on the formulation of assessment teams
- Work with line management from other sites/organizations to encourage and enable augmentee involvement in assessment activities.

Team Leader

- Appropriately considers including augmentees in assessment activities, factoring in the benefits and cost of the approach
- Leads the development, implementation, and revision (as necessary) of the assessment plan, including any description of augmentee participation
- Coordinates with augmentees to enable their full participation in the assessment activity
- Communicates any challenges with augmentee involvement in assessment activities to the cognizant EA-30 office director
- Provides feedback and lessons learned to EA management on augmentee involvement in the assessment activity.