

FACILITY REPRESENTATIVES (FR)

OBJECTIVE

FR.1: NNSA Site Office procedures and mechanisms are in place for Facility Representatives (FRs) of nuclear facilities and their line managers to verify that nuclear activities are formally and appropriately authorized and performed safely in a manner that protects the public, workers, and environment.

CRITERIA

1. NNSA Site Office procedures and mechanisms require day-to-day operational oversight of contractor nuclear activities at assigned facilities through FRs who have operational awareness and understand their assigned facilities (DOE O 226.1A; NA-1 SD 226.1A; NA-1 SD 411.1-1C).
2. FRs periodically verify implementation of nuclear facility documented safety analysis (DSA) controls such as Technical Safety Requirement (TSR) surveillance requirements, maintenance requirements, testing requirements, and specific administrative controls. The FR ensures that key elements of the conduct of operations (COO) safety management program (SMP) are effectively implemented at the facilities to which he or she is assigned (DOE O 226.1A, NA-1 SD 226.1A, DOE O 422.1).
3. NNSA Site Office procedures and mechanisms ensure that FRs appropriately execute their responsibilities involving events reported in the Occurrence Reporting and Processing System (ORPS). FRs follow up on events, evaluate root cause analyses, and ensure that corrective actions are taken to prevent recurrence. FRs also evaluate the effectiveness of the contractor's feedback and improvement mechanisms by reviewing the contractor's response to subreportable events (DOE O 231.1A).
4. NNSA Site Office procedures and mechanisms ensure that there is a process for FRs assigned to nuclear facilities to report issues and safety concerns to the contractor and the Site Office Manager and that issues are identified, documented, evaluated, categorized, and tracked to closure by line management (DOE O 226.1A; NA-1 SD 226.1A).
5. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-assessments) have been appropriately resolved, corrective actions have been completed and are adequate, or a clear path to completion is indicated (DOE O 226.1A; NA-1 SD 226.1A).
6. The NNSA Site Office has established formal training and qualification requirements and staffing levels for the FRs. Facility Representatives assigned to cover facility operations are qualified, and the minimum staffing levels are met. FR competence and awareness responsibilities include specific administrative controls and SMPs that affect activities in assigned facilities (DOE O 426.1, NA-1 M 426.1-1A, DOE-STD-1063-2006, DOE O 360.1B).

APPROACH

References:

- DOE O 226.1A, *Implementing Department of Energy Oversight Policy*
- DOE O 231.1A, *Environment, Safety and Health Reporting*
- DOE O 426.1, *Federal Technical Capability*
- DOE O 360.1B, *Federal Employee Training*
- DOE-STD-1063-2006, *Facility Representatives*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual*
- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*
- NA-1 M 426.1-1A, *Technical Qualification Program Plan for Federal Personnel with Safety Responsibilities at Defense Nuclear Facilities*

Record Reviews:

- Review the Site Office FRAM, appropriate DOE Orders and Manuals (e.g. DOE O 226.1A, DOE O 231.1A, DOE O 360.1B, DOE O 426.1, DOE-STD-1063 2006), and NNSA Site Office implementing procedures to determine whether an FR program has been properly implemented, and that the processes for the FR oversight of contractor nuclear operations and work are adequate and integrated with the NNSA Site Office oversight program. Verify that personnel assigned as FRs have clearly defined roles and responsibilities.
- Review FR procedures and documentation such as plans, periodic reports to NNSA Site Office line managers, and logs or journals to determine implementation of the FR program, feedback and improvement activities, and issues management processes.

Interviews:

- Discuss the FR program with selected NNSA Site Office line managers to determine the effectiveness of the FR program.
- Interview the FRs assigned to nuclear facilities and NNSA Site Office line managers to determine their understanding of FR roles and responsibilities, reporting requirements, and issues management processes.
- Interview FRs to determine their understanding of operations, the safety envelope, past

incidents and occurrences, conduct of operations principles, and stop-work authority, with an emphasis on assessing technical competence associated with assigned nuclear facilities and associated SMPs.

Observations:

- Site Office oversight activities and facility walkdowns with one or more FRs focusing on implementation of FR oversight field processes.