



Office of Environment, Safety and Health Assessments Protocol for Findings Management

PROTOCOL – EA-30-03

May 2021

Office of Enterprise Assessments
U.S. Department of Energy

Office of Environment, Safety and Health Assessments
Protocol for Findings Management

May 2021

Reviewed by:

Kevin M. Witt
Director EA-31
Office of Nuclear Safety and Environmental Assessments
Office of Environment, Safety and Health Assessments
Office of Enterprise Assessments

Date

Reviewed by:

Charles C. Kreager
Director EA-32
Office of Worker Safety and Health Assessments
Office of Environment, Safety and Health Assessments
Office of Enterprise Assessments

Date

Reviewed by:

Jack E. Winston
Director EA-33
Office of Emergency Management Assessments
Office of Environment, Safety and Health Assessments
Office of Enterprise Assessments

Date

Reviewed by:

Joseph J. Waring
Director EA-34
Office of Nuclear Engineering and Safety Basis Assessments
Office of Environment, Safety and Health Assessments
Office of Enterprise Assessments

Date

Approved by:

Kevin G. Kilp
Director EA-30
Office of Environment, Safety and Health Assessments
Office of Enterprise Assessments

Date

Table of Contents

1.0 Purpose..... 1

2.0 Applicability..... 1

3.0 Requirements..... 1

 A. EA-30 Findings Matrix Configuration Management 1

 B. Guidance for EA Staff Follow-up on Findings 1

 C. Trending of Site Effectiveness in Resolving EA Findings..... 2

 D. Review of the Adequacy of a Proposed Corrective Action Plan..... 3

4.0 Responsibilities 3

5.0 References 5

6.0 Appendix..... 5

Appendix A: Guidance for Verification of Corrective Actions A-1

Office of Environment, Safety and Health Assessments Protocol for Findings Management

1.0 PURPOSE

This protocol establishes the requirements, guidance, and responsibilities for managing and following up on findings identified in Office of Environment, Safety and Health Assessments (EA-30) oversight activities as required by Department of Energy (DOE) Order 227.1A, *Independent Oversight Program*. This protocol outlines the process for creating a tailored approach to follow up on findings based on their significance and complexity.

2.0 APPLICABILITY

This protocol applies to findings identified in appraisals conducted by EA-30 personnel. EA-30 staff may use this document as guidance if an appraisal chooses to follow up on deficiencies, however DOE O 227.1A does not require corrective action plans or subsequent tracking for deficiencies.

3.0 REQUIREMENTS

A. EA-30 Findings Matrix Configuration Management

1. The EA-30 administrative staff will process all changes to the matrix.
2. The matrix will consist of a master Excel sheet which contains all EA findings deemed appropriate for tracking by EA-30 Management, and which can be sorted by site, by Tier 2 office, or other factors.
3. The matrix will include the status of findings, whether they are open, closed by the site, verified by EA to be closed and resolved, or determined to be not effectively resolved. Unknown status shall also be included in the matrix.
4. Once a finding is greater than 5 years old, it is archived and not included in trended information, unless the finding has been followed up on more recently and determined to be not effectively resolved. Additionally, findings will be archived if they are applicable to only one facility and that facility no longer exists, or they are greater than 3 years old and associated with a contractor that has changed. Management discretion can also be applied to archive or continue to trend a finding. All findings should be followed up on before they are archived, or an explanation provided.

B. Guidance for EA Staff Follow-up on Findings

Note: Normally, the follow-up to verify that a finding has been effectively resolved by the site is included as an additional objective in the plan for a scheduled assessment. However, a standalone appraisal activity may be conducted to verify closure of findings. Typically, findings should be followed up on after approximately two years, although a longer or shorter period may be appropriate depending on the scope and significance of the corrective actions taken to address a particular finding.

1. Select finding(s) listed on the EA-30 Findings matrix for closure verification. The EA team leader should discuss the overall strategy for findings verification and validation with their cognizant Director (e.g., which findings and utilizing what oversight methods).
2. Select the appropriate EA appraisal activity to conduct verification and validation and identify the assessment activity in an EA assessment plan if necessary. EA has two main references: 1.) CRAD 30-01, *Contractor Assurance System* and 2.) CRAD 30-07, *Federal Line Management Oversight*, which provide criteria that supports an assessment of effective resolution of EA findings
3. For the finding(s) selected, obtain the site office and contractor issues management systems input information, closure documentation, and verify the finding(s) were managed in accordance with DOE O 226.1B §4.b.(4) processes and Quality Assurance Programs (QAP) established to meet the requirements of DOE O 414.1D, *Quality Assurance*, applicable version, 10 CFR Part 830, Nuclear Safety Management, and DOE O 151.1D (when appropriate).
 - a. The finding statement was accurately captured in the issues management systems.
 - b. The site evaluated the finding and took timely appropriate compensatory corrective actions until the finding could be resolved.
 - c. The finding evaluation conducted an appropriate extent of condition review.
 - d. The finding was appropriately categorized based on its significance, risk, priority, and the approved contractor QAP.
 - e. If the finding is categorized as higher significance; the causal analysis is of sufficient detail to identify the causes to be addressed.
 - f. The actions as written would correct the finding and prevent recurrence.
 - g. If the finding is categorized as higher significance; the contractor performed an appropriate effectiveness review after completion of all finding corrective actions that validates prevention of finding recurrence.
 - h. The finding was promptly communicated through the contractor management chain to the cognizant manager and corrected as soon as practicable (e.g., any delays were justified and compensatory and/or mitigating measures remained in place to prevent recurrence).
 - i. The site field office provided approval of the corrective action plan, if appropriate, and provided oversight of the finding closure as necessary (May be required by DOE 151.1D).
 - j. Completion of corrective actions must include a verification and validation process, independent of those who performed the corrective action, that verifies that the corrective action has been put in place and validates that the corrective action has been effective in resolving the original finding (DOE 151.1D only).
4. Select the appropriate corrective actions to be verified and validated. Verification of the effectiveness of corrective actions will normally consist of documentation review and field

activity. Validation to ensure corrective actions have been appropriately implemented, are achieving the desired outcomes and will ensure no future recurrence of the issue should be documented. See Appendix A for additional guidance.

5. Document the results of the EA findings verification and validation activities in the appropriate EA report format. Reviews that identified appropriate closure of all findings may be documented in either an assessment report or a field note. Reviews that looked at findings that were not effectively closed may be documented in an assessment report, a memo from the EA-30 director to the site manager, or a field note depending on the level of management attention required to address the identified issues. Regardless of format, the team should document the site's proposed actions to resolve the inadequately closed EA-30 finding.

C. Trending of Site Effectiveness in Resolving EA Findings

1. The EA Site Lead should review and update the EA-30 Findings Matrix for their assigned sites before presentation of their site briefings, which occur at least semiannually. Furthermore, the Site Lead should capture trend information on finding status such as closure quality, evaluate it against previous trend data, and update any trends. The purpose of trending the finding status is to determine the health of issues management by the site office/contractor, the quality of the relationship with EA, and the status of the individual topics.
2. The EA-30 Findings matrix for the individual sites have imbedded formulas to calculate and provide the results for trending. As the EA finding status is updated in the matrix, the trending information is automatically updated.

D. Review of the Adequacy of a Proposed Corrective Action Plan

1. A site lead or team lead may choose to conduct an informal review of a proposed corrective action plan, using the guidance provided in Appendix B. No documentation is expected.
2. At the discretion of the EA Director, or when requested by the cognizant DOE manager, EA must conduct a formal review of the adequacy of proposed corrective action plans developed in response to appraisal results and provide comments for site consideration, as required by DOE Order 227.1A, section 4(f)(2). However, most proposed corrective action plans will not require review by EA.
 - a. Obtain the proposed corrective action plan and verify it was developed in accordance with DOE O 226.1 processes and relevant site QAP requirements. Appendix B may be used for guidance.
 - b. The results of the proposed corrective action plan review will be documented in a memo from the EA-30 Director to the appropriate DOE manager.

4.0 RESPONSIBILITIES

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

- The Director recommends to the Director, Office of Enterprise Assessments, which EA finding proposed corrective actions plans should be considered for review by EA.

- The Director issues a memo to the appropriate Site Manager to capture findings that were not satisfactorily closed, if those results will not be documented in an assessment report or field note.
- The Director notifies the appropriate EA-31, 32, 33, or 34 Director when the review of the adequacy of a corrective action plan has been requested by the Director, Office of Enterprise Assessments, or cognizant DOE Manager in accordance with DOE Order 227.1A, section 4(f)(2).
- The Director issues a memo to the appropriate DOE Manager with the results when EA-30 conducts a review of the adequacy of a corrective action plan.

Directors, Office of Nuclear Safety and Environmental Assessments (EA-31), Office of Worker Safety and Health Assessments (EA-32), Office of Emergency Management Assessments (EA-33), and Office of Nuclear Engineering and Safety Basis Analysis Assessments (EA-34)

- The directors recommend to the Office of Environment, Safety and Health Assessments Director, which EA finding proposed corrective actions plans should be reviewed by EA.
- The directors assign appropriate technical staff to perform oversight and operational awareness activities.

Team Leader

- The Team Leader for an appraisal activity that identifies findings should review the matrix and ensure it contains a complete list of the findings from their report.
- The Team Leader for an appraisal activity that verifies closure of findings should review the matrix and ensure the finding status is current.
- The Team Leader, coordinating with the cognizant Site Lead, selects findings from the EA-30 Findings matrix for verification.
- The Team Leader ensures the team members apply appropriate rigor in their review of the selected findings and corrective actions.

Team Member

- Team members verifying the adequate closure of findings should select appropriate corrective actions to verify.
- Team members document the results of their findings verification activity in the format designated by the Team Leader.

Site Lead

- The Site Lead reviews the matrix for their sites before presentation of their site briefing and ensures it includes a complete list of findings for their site and updates the status of the findings as needed by contacting the administrative staff with requested changes.
- The Site Lead captures trend information on finding status such as closure quality and evaluates it against previous trend data and updates any trends.

- The Site Lead coordinates with the appropriate Team Leaders on their selection of findings to include in their appraisal activities.

Administrative Staff

- The administrative staff maintain configuration control over the EA findings matrix by entering findings when new reports are issued, marking findings as closed by the site when the team lead/site lead provides that input, marking findings as verified by EA once the finding follow up field note or report is issued, and archiving findings when they exceed the maximum age.

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 Order 151.1D, *Comprehensive Emergency Management System*

6.0 APPENDICES

- A. Guidance for Verification and Validation of Corrective Actions
- B. Guidance for Review of Proposed Corrective Action Plans

Appendix A

Guidance for Verification and Validation of Corrective Actions

The following activities are normally conducted to accomplish verification and validation of corrective actions, as described in Section B, through performance-based assessment (see PROTOCOL – EA-30-00)

- a. Review finding evaluation/categorization, corrective actions plan and finding closure documentation and the resultant changes to process or products (e.g., procedures, training & qualification, design media, etc.) to resolve the finding and the extent of condition.
- b. Evaluate causal analysis documentation including methodology, staffing, conclusions, and subsequent management actions.
- c. Evaluate effectiveness review documentation including methodology, staffing, conclusions, and subsequent management actions.
- d. Evaluate contractor assurance program actions that verified finding closure and subsequent communications with site office management.
- e. Evaluate Site Office oversight actions that pertain to the closure of finding corrective actions.
- f. Interview management and staff personnel utilizing the products, procedures, etc. changed by the corrective actions to ensure the appropriate level of knowledge can be demonstrated.

Note: Validation during finding corrective action closure in most cases is not a simple activity and sufficient time should be allotted to prepare for the activity. A good rule of thumb for preparation is every one hour in the field should include about two hours of document review and preparation.

- g. Select activities affected by the corrective actions changes to ensure adequate implementation (verification) and improved performance (validation). To determine if the corrective actions resulted in improved performance, the expected outcome of the contractor activities must be understood by the EA oversight team. Before conducting field observations to verify implemented corrective action and validate improved performance, the EA oversight team must have working level knowledge of the activity through review of the corrective action documentation, specific activity documentation, and supporting technical basis documentation (e.g., safety basis, program description, managed document hierarchy, procedures, design media, training & qualification records, etc.).
- h. For validation of EA-33 findings, observation of acceptable performance must be observed during an evaluated drill, limited scope performance test, or site exercise.
- i. The focus of the validation is on corrective action implementation that results in improved performance that complies with requirements. Consistent with the graded approach, and efficient use of limited resource and available on-site time, the validation of the individual corrective actions may be tailored to allow focus toward evaluating improved contractor performance (e.g., included as an exercise objective). If the observed performance demonstrates compliance with requirements, there is confidence that the corrective actions were effective.
- j. Additional insights on performance may be gained by reviewing recent assessments conducted by the site office personnel and the site contractor assurance system for the activities affected by the corrective actions. In addition, review of performance metrics (before and after corrective action implementation) may provide useful insights.

Appendix B
Guidance for Review of Proposed Corrective Action Plans

When reviewing a proposed corrective action plan, consider the following:

- a. The finding statement was accurately captured in the issues management system and reflects the non-compliance.
- b. The finding was promptly identified to the cognizant manager.
- c. The corrective action plan includes appropriate interim compensatory and mitigating measures that will address the non-compliance until the corrective actions are implemented.
- d. The finding was categorized (assigned the appropriate priority level or significance level) based on its significance and the graded approach for the site invoked in its quality assurance plan.
- e. If performed, the causal analysis for the finding is of sufficient detail to identify the causes to be addressed. Additionally, the individuals who performed the causal analysis were well-qualified to do so, based on training and/or experience.
- f. The actions, if properly implemented, will address the non-compliance of the finding and the extent of this finding/condition and its causes, if determined based on the categorization of the finding.
- g. The due dates on the corrective actions support timely implementation.