

# Office of Environment, Safety and Health Assessments Protocol for Oversight Planning

PROTOCOL – EA-30-02 Revision 0

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Office of Enterprise Assessments U.S. Department of Energy

# Office of Environment, Safety and Health Assessments Protocol for Oversight Planning

## May 2022 Revision 0

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#### Office of Environment, Safety and Health Assessments Protocol for Oversight Planning

#### 1.0 PURPOSE

The purpose of this process is to identify, prioritize, integrate, and schedule planned site oversight activities developed by the Office of Nuclear Safety and Environmental Assessments (EA-31), the Office of Worker Safety & Health Assessments (EA-32), the Office of Emergency Management Assessments (EA-33), and the Office of Nuclear Engineering and Safety Basis Assessments (EA-34).

The process relies on EA-31 Site Leads' site-specific oversight plans ((SOPs), reference: Protocol EA-31-01, Office of Nuclear Safety and Environmental Assessments Protocol for Site Leads) maintained in their Site Briefing Notes (SBNs), which identifies planned oversight activities (e.g., assessments and operational awareness activities) for their assigned site(s). The goal of this process is to facilitate the "risk-informed" identification and scheduling of a suite of oversight activities that will evaluate nuclear safety, worker safety, and emergency management vulnerabilities faced by the Department and support development and implementation of the EA Operational Plan. This process will result in an updated EA-31/34 Risk Scoring file and the EA-30 Resource Loading and Integration Team (RLIT) updating the EA-31/32/34 Resource Loaded Oversight Plan (RLOP).

#### 2.0 APPLICABILITY

This protocol applies to EA-31 and EA-34 oversight selection and scheduling activities in coordination with EA-32 and EA-33 planned oversight.

#### 3.0 REQUIREMENTS

#### General

- EA-31/32/33/34 use appendix A in identifying assessment functional areas and appendix B to support the independent oversight planning and resource loading process.
- Site Leads identify planned EA-31/32/33/34 oversight activities in their SBNs SOPs using the steps in appendix B.
- Site Leads will submit draft SOPS to the EA-31 Director by January 15 and July 15 of each year to support the RLIT process to ensure that approved SOPs are available by the fourth week in February and the fourth week in August to support the EA-30 Director's semi-annual site coordination calls with each DOE site that has an assigned EA-31 Site Lead.
- EA-32, EA-33, and EA-34 will make current published oversight plans and schedules available to Site Leads; this supports integration of shared subject matter experts between EA-31, EA-32, and EA-34, which can impact the scheduling of some EA-30 oversight.
- Site Leads will use their updated SBNs SOP to maintain up-to-date proposed oversight activities, in coordination with site points of contact, semi-annual site coordination calls, and EA-32, EA-33, and EA-34 Directors, as appropriate.
- Site Leads will ensure that all new oversight assessments are entered into the EA-30 Risk Scoring file; EA-32 and EA-33 assessments do not receive a risk score.

- Assessment Team Leads from EA-31 and EA-34 will update risk scores and identify the required functional area resources in the EA-30 Risk Scoring file located at O:\ drive\COMMON\RLIT-Oversight Planning.
- The EA-31 and EA-34 Office Directors will review and approve the Risk Scoring file updates/inclusions to support oversight prioritization by the RLIT.
- The EA-31 and EA-34 Office Directors will use the EA-30 Risk Scoring file to "inform" the selection of independent oversight activities on areas of greatest potential nuclear safety risk. Generally, higher schedule priority and greater emphasis are placed on conducting oversight of high consequence activities, such as high hazard nuclear operations and major nuclear project design, construction, and commissioning.
- The EA-31 and EA-34 Office Directors will consider additional factors when identifying and prioritizing EA-31 and EA-34 planned oversight, such as, required oversight driven by Section 303 in the Energy and Water Development Appropriations Act, senior Department of Energy management requests, site office requests, and input from EA-31 Site Leads and EA-34 Functional Leads based on formal analysis or awareness of current site operations and issues.
- The RLIT, composed of the EA-31 and EA-34 Office Directors and the EA-30 Environment, Safety, and Health Evaluation Task Leader support contractor, will schedule and assign resources to the selected oversight activities.
- The RLIT will integrate selected oversight activities into the RLOP as confirmed and targeted scheduled oversight activities. Integration may require further discussion and coordination with Assessment Team Leads and the EA-31, EA-32, and EA-34 Office Directors. If scheduling conflicts arise due to resource limitations that cannot be resolved by the EA-31, EA-32, and EA-34 Office Directors, then the EA-30 Deputy Director will reconcile the conflict. A final list of the forthcoming FY assessments is provided to EA-30 for review and acceptance by April 1 and October 1.
- Site Leads will update their SOPs based on the final RLOP; a copy of each SOP (approved by the EA-31 Office Director) will be saved on the O-drive folder (O:\ drive\COMMON\RLIT- Oversight Planning\ Site Oversight Plans (SOPs)) and used for the semi-annual site coordination calls.
- Site Leads will coordinate any necessary revisions to the SOP, based on site calls, with the appropriate director and the RLIT.
- Maintenance of the RLOP will continue until the next RLIT semi-annual review. Changes to the RLOP, based on updated SOPs, will be coordinated through the respective EA-30 office director, who then directs the EA-30 Environment, Safety, and Health Evaluation Task Leader support contractor to record the changes in the RLOP file.
- Assessment Team Leads will update the EA-30 Onsite Calendar, where necessary.

Figure 1. Independent Oversight Planning and Resource Loading Process

#### SOP Update

 Site Leads update their SBN, SOP and extract a copy (post on O:drive). Update the EA-30 Risk Scoring file with new planned assessments and new/updated risk scores.

Output: New/updated SOPs and updated EA-30 Risk Scoring file provided to supervisor.

#### Analysis Elements

- Appendix A
- Appendix B, section 1.0
- Protocol EA-31-01, Office of Environment, Safety and Health Assessments Protocol for Site Leads



#### SOP Concurrence

EA-31 and EA-34 Office Directors review and concur on the SOPs and Risk Scoring file, as appropriate.

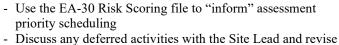
Output: SOP(s) with EA-31/EA-34 concurrence



#### **RLOP** Development

The RLIT consolidates, integrates, and resource loads the RLOP using the SOPs informed by the EA-30 Risk Scoring file; resolves any EA-30 comments.

Output: RLOP provided to EA-30 for review



- Discuss any deferred activities with the Site Lead and revise on the SOP
- Identify assessment "target dates" to facilitate resource allocations



#### SOP Review and Approval and Site Calls

Site Leads update their SOPs based on the RLOP, obtain EA-31 office director approval, post SOPs on the O-drive and participate in semi-annual site coordination calls

SOP changes from site calls are used by the RLIT to update the RLOP.

Output: Final Approved SOP coordinated with the site senior management and updated RLOP; updated SBN, SOP; Updated EA-30 Onsite Calendar (next 6 months).

#### **RLOP Maintenance**

- Update RLOP assessment "target dates" based on site office feedback
- Identify final assessment dates as coordinated with subsequent Site Lead interactions with site office personnel.
- Identify new planned assessments in SBN SOPs.

#### 4.0 RESPONSIBILITIES

#### **Director, Office of Environment, Safety and Health Assessments**

- 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)
- Leads the EA-30 site coordination calls.

#### **Deputy Director, Office of Environment, Safety and Health Assessments**

- Establishes the RLIT for each fiscal year
- Resolves oversight scheduling conflicts that arise due to resource limitations if they cannot be resolved at a lower level.

#### **Director, Office of Nuclear Safety and Environmental Assessments**

- In coordination with the Director, Office of Nuclear Engineering and Safety Basis Assessments, reviews and approves the EA-30 Risk Scoring file for subsequent use by the RLIT to assist with assessment prioritization
- In coordination with the Deputy Director, Office of Environment, Safety and Health Assessments, approves each SOP.

# <u>Directors, Office of Worker Safety and Health Assessments, Office of Emergency Management</u> Assessments, and Office of Nuclear Engineering and Safety Basis Assessments

- Provide and support input of planned oversight into the EA-30 Risk Scoring file
- Support the RLIT process to prepare for the semi-annual site coordination calls
- Assign appropriate technical staff to perform oversight.

#### **EA-31 Site Leads**

- Update SBN SOP to document planned oversight activities on a semi-annual basis
- Coordinate with line managers during semi-annual planning to identify independent assessments and operational awareness activities and schedules consistent with priorities for the next fiscal year
- Submit by January 15 and July 15 of each year the draft SOP, which includes the proposed schedule
  of activities and associated resource needs, to the EA-31 Office Director for review in support of the
  RLIT process
- Participate in the site coordination calls for assigned site(s).

#### **Assessment Team Leads**

- Update the risk scores and identify the required functional area resources in the EA-30 Risk Scoring file located at O:\ drive\COMMON\RLIT- Oversight Planning
- Update the EA-30 Onsite Calendar, where necessary.

#### **RLIT**

- Integrates and resource loads all identified oversight into the RLOP as confirmed and targeted scheduled oversight activities
- Maintains the RLOP.

#### 5.0 REFERENCES

- DOE Order 226.1, *Implementation of Department of Energy Oversight Policy*
- DOE Order 227.1, *Independent Oversight Program*
- Protocol EA-30-03, Office of Environment, Safety and Health Assessments Protocol for Findings Management
- Protocol EA-31-01, Office of Nuclear Safety and Environmental Assessments Protocol for Site Leads
- Protocol EA-31-03, Office of Nuclear Safety and Environmental Assessments Protocol for Identification of Topical Areas for Enterprise-wide Targeted Nuclear Safety Assessments
- Protocol EA-34-00, Office of Nuclear Engineering and Safety Basis Assessments Protocol for High-Hazard Nuclear Facility Project Oversight

# APPENDIX A Description of Assessment Functional Areas

#### 1.0 PURPOSE

This appendix provides a description of the assessment functional areas (AFAs) used by EA-31, EA-32, EA-33, and EA-34 to identify what elements of a nuclear safety program and non-nuclear safety program an assessment is focused, or an issue is associated.

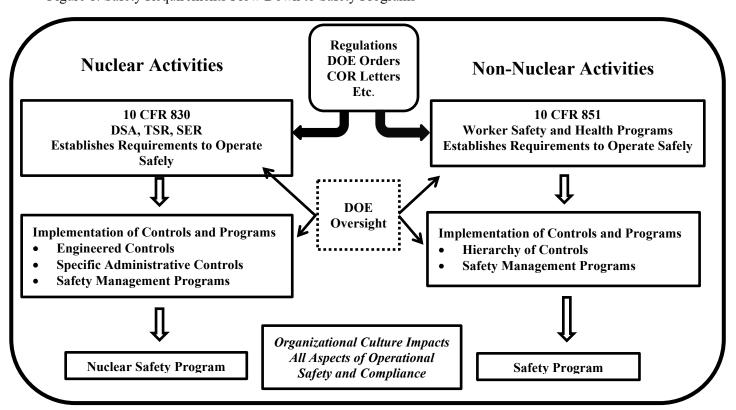
#### 2.0 APPLICABILITY

This appendix applies to EA-31, EA-32, EA-33, and EA-34.

#### 3.0 ASSESSMENT FUNCTIONAL AREAS

AFAs are closely linked to the elements of a nuclear safety program and non-nuclear safety program, which is established through implementation of an Integrated Safety Management (ISM) Program. ISM is the top tier management program that flows down the safety requirements that establish an environment of safety in all aspects of DOE's work activities. As shown in Figure 1, implementation of safety requirements at the facility and activity level occurs through an overall safety program that is defined by regulations, DOE directives, and facility safety documentation. Normally, the safety programs are established as a "Nuclear Safety Program" for nuclear-related activities and a "Safety Program" for non-nuclear activities.

Figure 1: Safety Requirements Flow Down to Safety Programs



Based on reviews of the DOE nuclear safety requirements and regulatory expectations and comparisons of the AFAs to the elements of a nuclear safety program, the following AFAs are identified:

#### Nuclear Safety Design Basis

The nuclear safety design criteria in DOE Order 420.1, *Facility Safety*, apply to new hazard category 1, 2, and 3 nuclear facilities or major modifications to existing facilities. Assigned Site Leads work with the safety basis lead to determine the overall strategy for each project, and project-specific CRADs and plans are established.

#### • Reactor Design

DOE Order 420.1 establishes the nuclear safety design criteria applicable to the design, fabrication, construction, testing, and performance requirements of nuclear reactor facilities and safety class structures, systems, and components (SSCs) within these facilities. This order applies to both new and existing reactor facilities. Design reviews of nuclear facilities with a reactor are conducted in conjunction with safety basis adequacy reviews. Reactor operations are assessed as an additional assessment functional area for the applicable site.

#### Nuclear Safety Basis Maintenance

The Nuclear Safety Basis Maintenance AFA includes oversight of existing nuclear facilities safety bases implementation as well as safety basis changes.

#### • Safety Basis Documentation Adequacy

10 CFR 830.202 states that the contractor must prepare a documented safety analysis (DSA) that defines the scope of work to be performed, identify and analyze the hazards, categorize the facility consistent with DOE-STD-1027, and establish the hazard controls to ensure adequate protection of workers, the public, and the environment. In addition, the safety basis must be kept current and reflect changes in the facility, work, and the hazards.

#### • Technical Safety Requirement (TSR) Implementation

Adequate implementation of the controls established in the TSR, including limiting conditions for operation, surveillance requirements, specific administrative controls, administrative controls, and design features, is assessed as part of the Nuclear Safety Basis Maintenance AFA. This can include oversight of TSR implementation validation reviews and other similar assessments of TSR implementation.

#### • Delegation of Approval Authority

The review and approval of safety basis documents ensures that the contractor has evaluated all hazards associated with a facility and activity, established a defense-in-depth philosophy to control hazardous materials and initiating events, identified the important physical barriers to safely contain the hazardous materials, and demonstrated that the facility design meets applicable regulations and requirements.

#### • Unreviewed Safety Question (USQ) Process

10 CFR 830.203 states that the contractor responsible for a hazard category 1, 2, or 3 DOE nuclear facility must establish, implement, and take actions consistent with a USQ process. The contractor procedure that establishes the USQ program at a site is reviewed and approved by the DOE approval authority designated through delegation from DOE-HQ. In addition, a contractor responsible for a hazard category 1, 2, or 3 DOE nuclear facility must obtain DOE approval prior to taking any action determined to involve a USQ. The use of the USQ process mainly occurs through the configuration management of facilities and safety management program documentation.

#### • Natural Phenomena Hazards (NPH) Mitigation

DOE Order 420.1 establishes requirements for NPH mitigation. Changes to NPH may necessitate additional review of the nuclear facility safety basis. For facilities or sites with existing NPH assessments, Site Leads maintain cognizance of the status of these reviews, review the results and recommended actions, and follow up on planned actions as appropriate. This functional area is normally evaluated as an operational awareness activity by the assigned Site Lead; however, if significant issues are identified in the functional area, an assessment may be conducted.

#### Startup and Restart (Readiness Review)

The readiness review process establishes the requirements for verifying readiness for startup of new hazard category 1, 2, and 3 nuclear facilities, activities, and operations, and for the restart of existing hazard category 1, 2, and 3 nuclear facilities, activities, and operations that have been shut down. A site's startup notification report will identify the upcoming readiness review activities for a given fiscal year.

#### Safety System Management

#### • Nuclear Maintenance Management Programs

The maintenance of safety systems ensures reliable performance of SSCs relied upon to protect workers, the public, and the environment as specified in the facility safety basis. The maintenance management program requirements established in DOE Order 433.1, *Maintenance Management Program for DOE Nuclear Facilities*, apply to hazard category 1, 2, and 3 nuclear facilities. Maintenance management programs are typically sampled as an element of safety system management assessments.

#### • Cognizant System Engineer Program

Cognizant system engineer (CSE) programs are required by DOE Order 420.1 for all hazard category 1, 2, and 3 nuclear facilities that have attained operational status (such as achieving CD-4) and have:

- Active safety class or safety significant SSCs, as defined in the facility's DOE-approved safety basis documentation, or
- Other active systems that perform important defense-in-depth functions, as designated by facility line management.

CSE programs include assignment of individuals to monitor important systems and ensure continued operational readiness of systems and features relied upon to prevent or mitigate the consequences of severe accidents. CSE assessments are typically conducted as an element of safety system management assessments or during conduct of engineering assessments.

#### Surveillance Testing

Nuclear facility TSRs include, in part, testing, calibration, or inspection to ensure that the necessary operability and quality of safety SSCs and their support systems required for safe operations are maintained, and that facility operation is maintained within acceptable limits. Assessments to determine whether testing, calibration, or inspection requirements are met are conducted as part of safety system management assessments.

#### Packaging and Transportation Safety

When the safety basis for a nuclear facility credits a container as part of the defense-in-depth strategy to control hazardous materials during staging and onsite transportation activities, the integrity of the containers must be maintained to acceptable values. When a container is credited in the safety basis to provide a

barrier for material release, it is performing the safety function as a passive design feature and should be evaluated as a safety SSC.

#### Emergency Management

A comprehensive emergency management system is established per DOE Order 151.1, *Comprehensive Emergency Management System*. The system includes planning, preparedness, response, and recovery elements to ensure that DOE can respond to operational emergencies, implementing appropriate response measures to protect workers, the public, the environment and national security, and that reentry activities, recovery, and post-emergency activities commence promptly and safely. Sampling of emergency management system implementation may include program and/or exercise assessments.

#### Fire Protection Program

Fire protection programs and features are critical in both preventing the initiation and mitigating events that can have a significant adverse event at nuclear facilities and operations. DOE's fire protection requirements, specified in DOE Order 420.1C, apply to all government-owned or leased facilities and onsite contractor-leased facilities used for DOE mission purposes.

#### Criticality Safety Program

Criticality safety programs provide controls to prevent inadvertent criticalities and the resultant extremely high levels of radiation and include both engineered and administrative controls. Nuclear criticality safety requirements mandated by DOE Order 420.1C apply to nuclear facilities and activities that involve or will potentially involve radionuclides in such quantities that are equal to or greater than the single parameter limits for fissionable materials listed in ANSI/ANS-8.1-1998, *Nuclear Criticality Safety in Operations with Fissionable Materials Outside Reactors*, and ANSI/ANS-8.15-1981, *Nuclear Criticality Control of Special Actinide Elements*.

#### Radiation Protection Program

Occupational radiation protection programs ensure provide assurance that radiation dose limits are not exceeded and minimize doses to workers. Limits and program requirements are provided in 10 CFR 835. Public and environmental radiation protection programs minimize doses and provide assurance that limits are not exceeded. Requirements for radiation protection of the public and environment are specified in DOE Order 458.1, *Radiation Protection for the Public and Environment*, and apply to all elements that are responsible for, or provide support for, the management and operation of DOE sites conducting radiological activities or management of DOE radioactive material or property that can result in exposures of the public to radiation or radioactive material.

#### Radioactive Waste Management

DOE nuclear facilities generate high-level waste, transuranic waste, low-level waste, and mixed waste with a radioactive component. DOE's radioactive waste management processes ensure the protection of worker and public health and safety, and the environment from the associated hazards.

#### Work Planning and Control

The work planning and control (WP&C) management process directly implements ISM and establishes the interface between the facility worker and the incorporation of requirements established by the nuclear safety program. Ineffective implementation of a WP&C management process will result in degradation of nuclear safety program performance and eventually lead to initiating events that could result in challenging the defense-in-depth safety established for a facility or an activity and result in the potential release of hazardous materials.

#### Organizational Safety Culture Support Programs

#### • Employee Concerns Programs (ECPs)

ECPs in accordance with DOE Order 442.1, *Department of Energy Employee Concerns Program*, are established at sites and include both Federal and contractor programs. These programs provide a method for employees to raise concerns when other methods do not result in effective resolution. ECPs are an important element of a safety conscious work environment.

#### • <u>Differing Professional Opinion (DPO)</u>

DOE's DPO process provides a method for employees to raise technical concerns related to environment, safety and health that cannot be resolved using routine processes. DOE Order 442.2, *Differing Professional Opinions for Technical Issues Involving Environment, Safety and Health*, establishes the requirements for implementation of the DPO process. The DPO process supports a safety conscious work environment. Assessments of field DPO processes are typically combined with assessments of ECPs.

#### Conduct of Engineering

This AFA focuses on assessment of the engineering function at nuclear facilities either in operation or under construction. The engineering function may be comprised of various elements as governed by the design/construction or operational stage of the facility. Conduct of engineering reviews focus on engineering processes, the CSE program, engineering products, the program, configuration management, engineering procurement, issues management within the engineering organization, and field office oversight of the engineering function.

#### Shutdown Facility Risk Management

The assessment of shutdown facility risk management evaluates the effectiveness of programs and processes for fire protection, surveillance, and maintenance of permanently shutdown facilities that still contain material at risk greater than the hazard category 3 threshold.

#### **Cross-cutting Assessment Functional Areas**

Functional areas that have applicability to multiple AFAs are designated as cross-cutting. Some elements of a cross-cutting AFA are normally included as part of an assessment activity for an AFA. For example, the implementation of the receipt inspection requirements of the quality assurance (QA) program may be assessed for the purchase of spare parts during a safety system management assessment.

The following AFAs are designated as cross-cutting:

#### **Ouality Assurance**

QA requirements for activities that affect or may affect the safety of DOE nuclear facilities are established in 10 CFR 830, *Nuclear Safety Management*, Subpart A, *Quality Assurance Requirements*. Additional delineation of DOE QA requirements that apply more broadly are specified in DOE Order 414.1, *Quality Assurance*. DOE's QA requirements apply broadly. Consistent with DOE's independent oversight program, the focus of QA oversight activities is on high consequence activities such as high hazard nuclear operations. QA implementation is sampled either as an element of other topical areas, such as safety system management, or stand alone.

#### Conduct of Operations

Conduct of operations programs consist of formal documentation, practices, and actions implementing disciplined and structured operations established to ensure safe and reliable operations by minimizing the likelihood and consequences of human fallibility or technical and organizational system failures.

Requirements specified in DOE Order 422.1, *Conduct of Operations*, apply to all category 1, 2, and 3 nuclear facilities and other facilities when designated by line management. Conduct of operations programs are typically sampled as an element of safety system management assessments.

#### Training and Qualification

The requirements specified in DOE Order 426.2, *Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities*, apply to contractor personnel who can impact the safety basis through their involvement in the operation, maintenance, and technical support of hazard category 1, 2, and 3 nuclear facilities. Assessments of personnel training program implementation are typically integrated with assessments of other topical areas.

#### Federal Line Management Oversight

DOE Order 226.1, *Implementation of Department of Energy Oversight Policy*, applies to oversight processes implemented by DOE line management organizations (both Headquarters and Field Elements) that manage or operate onsite oversight programs and DOE independent oversight organizations. Line oversight is performed to determine whether the contractor programs and management systems, including assurance and oversight systems, are performing effectively and comply with DOE requirements. Oversight programs include operational awareness activities, onsite reviews, assessments, self-assessments, performance evaluations, and other activities that involve evaluation of contractor organizations that manage or operate DOE sites, facilities, or operations. Issues identified through line oversight should be captured in the DOE office issues management program.

#### Issues Management Process

The focus of this ATA is on evaluating the use of the issues management process (IMP) by the contractor to capture, evaluate, prioritize, develop, and implement effective corrective and preventive actions for identified safety issues. In addition, the IMP database should be used to trend issues and evaluate the trend against established performance objectives. Information concerning a site's performance that is identified through trends from issues is an important indicator of a safety management program's health and input to the contractor assurance system. The assessment will consist of an evaluation of the procedures and processes used by the contractor to demonstrate on-going implementation of IMPs and evaluation of a sample of the resolution of previously identified issues.

#### Additional Assessment Functional Areas

Additional AFAs have been established for high hazard nuclear facility projects and are discussed below. There is an expectation to conduct assessments of any new (or significant modification to a) nuclear facility meeting the threshold of a capital assessment project delineated in the latest approved revision of DOE Order 413.3, *Program and Project Management for the Acquisition of Capital Assessments*. EA independent oversight for nuclear facility projects focuses on five general areas as appropriate for the project progress:

- Safety Basis/Design (See Protocol EA-34-00)
- QA These assessments focus on evaluating the establishment of QA processes and determining
  whether construction and commissioning activities that are important to safety are conducted in
  accordance with established QA requirements. Specific areas assessed are based on the stage of the
  project and typically include design control; procurement, including control of purchased items and
  services; inspection and testing; and control of nonconforming items, corrective actions, and audit
  processes.
- Construction Quality These assessments focus on the most important SSCs and are used to provide assurance that the technical requirements specified have been adequately captured in construction

- documents. They also focus on ensuring that work and inspections are being accomplished in accordance with these requirements, records are kept, and deficiencies are addressed. Areas assessed are based on the stage of the project and typically include structural concrete; structural steel and supports; piping and supports; mechanical equipment installation; electrical supply and backup power distribution components; and instrumentation and control for major systems.
- Startup Readiness These assessments include concurrent assessments of selected aspects of line management operational readiness reviews. Operational readiness reviews are structured multidisciplinary activities conducted by line management to assure that a new facility or significantly modified facility can be operated safely within the approved safety basis. EA personnel will assess a line management oversight activity to evaluate compliance with safety requirements and to observe the effectiveness of the line management oversight.
- Startup Program/Turnover These assessments focus on evaluation of the facility's performance of the approved start-up program following DOE approval for operations, including oversight of the initial graded operations and testing up to full operations. Areas assessed typically include confirmation of equipment operability; viability of procedures (including safety basis implementing procedures); performance and knowledge of the operators; initial introduction of the nuclear hazard into the facility; compliance with any restrictions or compensatory measures required during the approval to full operations; and, where applicable, the turnover process form the construction and/or commissioning contractor(s) to the operating contractor.

# APPENDIX B Independent Oversight Planning and Resource Loading Process

# 1.0 Updating Site-specific Oversight Plans (SOPs)

Approximate Timeline	Actions
December 1 and June 1	EA-31 Director (or delegate):
and June 1	Direct Site Leads to update their SBN SOP(s) and coordinate with site points of contact by early January and July. Post a copy in folder, O:\ drive\COMMON\RLIT - Oversight Planning\ Site Oversight Plans (SOPs).
December and	Site Leads:
June	Update SOP by performing the following:
	<ol> <li>Review the oversight priorities established in the EA annual Operational Plan to ensure that the SOP aligns with EA priorities.</li> <li>Use input from EA-32, EA-33 and EA-34 on their oversight activities planned for the next 18 months. (EA-32, EA-33 and EA-34 independently coordinate with their site points of contact).</li> <li>Use input from the EA-31 and EA-34 functional area leads (e.g., fire protection, safety basis, criticality safety) on assessments that they are planning or recommending for the Site Leads' site(s).</li> <li>Include suggested oversight from EA-31/34 Field Notes on topical area assessments resulting from Protocol EA-31-03.</li> <li>Analyze information sources (e.g., contractor assurance system (CAS) reports, ORPS, Defense Nuclear Facilities Safety Board (DNFSB), Office of Inspector General (OIG), Government Accountability Office (GAO), previous EA assessment results) to determine nuclear facility safety performance and potential leading indicators in order to identify conditions adverse to nuclear safety.</li> <li>Review safety basis documentation for the site's nuclear facilities to understand the relative importance of credited controls and safety management programs (SMPs) in the hazard control strategy (e.g., SMPs relied on for high consequence events in the hazard or accident analysis; key elements embedded in SMPs; technical safety requirement specific administrative controls associated with an SMP). Factor this into the identification of potential functional areas and general assessment scope to be considered for inclusion in the SOP.</li> <li>Analyze the types of ongoing or planned activities for the site's nuclear facilities that may validate the importance of certain credited controls and SMPs.</li> <li>Consider the need to follow up on past EA-30 findings and deficiencies per Protocol EA-30-03, Office of Environment, Safety and Health Assessments Protocol for Findings Management. Factor this into the identification of potential functiona</li></ol>
	<ul> <li>the SOP. Folder O:\EA31\Site Lead Data Sources\ contains Excel data files and hyperlinks to EA reports that are useful resources.</li> <li>9. Consider assessments planned or recently completed by other organizations (e.g., Headquarters program offices, field/site offices, contractors, DNFSB technical</li> </ul>

Approximate Timeline	Actions
	staff, and OIG) to identify opportunities for concurrent EA oversight activities or, conversely, to avoid duplication.
	EA-31 and EA-34 Assessment Team Leads:
	1. Update any needed changes from the SOP, including risk scores and the required functional area resources, in the EA-30 Risk Scoring file, O:\ drive\COMMON\RLIT- Oversight Planning.
Jan. week 1-2	Site Leads:
and	1. Submit SOP to the EA-31 Office Director by January 15 and July 15 of each year, to support the oversight planning and resource loading process described below.
July week 1-2	2. Provide identified weeks not available for travel (one year look ahead) to the EA-31 Director, if known.

# 2.0 Resource Loading and Integrating Site-specific Oversight Plan Updates

Approximate Timeline	Actions
December 1	EA-30 Deputy Director:  Establish the Resource Loading and Integration Team (RLIT) for the upcoming fiscal year.  Note: The RLIT should include the EA-31 and EA-34 Directors, additional Federal staff as determined by the EA-30 Deputy Director, and at least one member from the EA-30 Support Contractor.
Jan. week 3 – Feb. week 3 and July week 3 – Aug. week 3	<ol> <li>Use the updated Risk Scoring file and consider other management factors to make initial changes to the RLOP file pending Site Lead semi-annual site coordination calls.         <ul> <li>De-conflict overlapping activities that may compete for similar SMEs</li> <li>Select the number and locations of proposed activities across the complex, according to priority level and budget/resource constraints</li> <li>Identify specific proposed schedule dates, if not already provided, for targeted assessments within the next 12 months.</li> <li>Assign SMEs</li> <li>Meet with EA-30 Deputy Director to resolve conflicts if RLIT cannot resolve.</li> </ul> </li> <li>Site Leads</li> <li>Site Leads discuss EA conflicts regarding proposed schedule and renegotiates an acceptable schedule with their site POC.</li> </ol>

Approximate Timeline	Actions
	2. Inform the RLIT to update the Risk Scoring file and RLOP with revised dates.
	3. Update SOP accordingly and obtain EA-31 director approval.

## 3.0 Site Coordination Calls

Approximate Timeline	Actions
Feb. week 4 –	Site Lead:
March week 4	
and Aug. week 4 – Sept. week 4	<ol> <li>Any input from site semi-annual coordination calls that impact the RLOP schedule is discussed with the RLIT.</li> <li>Final agreed changes are communicated to the site POC and updated in the RLOP.</li> <li>Distributes the approved SOPs to interested parties (e.g., site points of contact, Site Leads, and team members). EA-30 Director may distribute the approved</li> </ol>
	SOP to additional interested parties (e.g., Headquarters program offices, Departmental Representative to the DNFSB).
April 1 and	RLIT:
October 1	
	1. Develop an Excel table from the Risk Scoring file identifying the planned assessments over the following 12 months.

# 4.0 Change Process

Changes to the approved SOPs are managed by the EA-31 Director with the support of the RLIT and Site Leads as needed.

As needed	Site Leads:  1. Identify any requested or required changes to the SOPs and submit them to the
	EA-31 Director.
As needed	EA-31/32/33/34 Directors:
	<ol> <li>Analyze the impacts of requested or required changes to the SOP with the support of Site Leads and RLIT as needed.</li> <li>Request the RLOP be updated, as necessary.</li> <li>Request that the EA-30 Onsite Calendar be updated to reflect the changes.</li> </ol>
As needed	Site Leads:
	<ol> <li>Update the affected SOPs</li> <li>Notify affected parties, including Assessment Team Leads, team members, and the site.</li> </ol>