



# **Office of Nuclear Safety and Environmental Assessments Protocol for Site Leads**

**PROTOCOL – EA-31-01  
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Office of Enterprise Assessments  
U.S. Department of Energy

**Office of Nuclear Safety and Environmental Assessments  
Protocol for Site Leads**

**May 2022**

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## 1.0 PURPOSE

The purpose of this protocol is to establish the requirements and responsibilities for the Office of Nuclear Safety and Environmental Assessments (EA-31) Site Leads. Site Leads are assigned to U.S. Department of Energy (DOE) major sites with nuclear facilities. This protocol also establishes requirements and processes for (1) operational awareness, (2) selection of assessment functional areas, and (3) development of site briefing notes (SBNs) and the conduct of routine site briefings.

## 2.0 APPLICABILITY

This protocol is applicable to EA-31 with support from EA-32, EA-33, and EA-34.

## 3.0 REQUIREMENTS

The Site Lead program embodies the Office of Enterprise Assessments (EA) methodology for collecting and analyzing information and identifying oversight-related activities, including independent assessments and operational awareness. Collectively, these oversight-related activities help EA provide effective independent oversight of high-hazard nuclear facilities.

- Site Leads are assigned to DOE sites or groups of sites with nuclear facilities that are categorized as hazard category 1, 2, or 3 in accordance with the provisions of 10 CFR 830 and DOE Standard 1027.
- Site Leads serve as the primary EA-31 liaison and point of contact to the DOE offices that provide oversight of nuclear facility operations.
- The Site Lead program also facilitates other Office of Environment, Safety and Health Assessments (EA-30) assessments such as worker safety and health assessment activities and emergency management assessment activities. These activities may result from significant performance deficiencies, response to external stakeholders, or requests from line organizations.
- Site Leads shall maintain operational awareness of their assigned sites using such information sources as identified in Appendix A.
- Site Leads shall analyze information sources to determine nuclear facility safety performance and potential leading indicators in order to identify conditions adverse to nuclear safety. Protocol EA-30-02, *Office of Environment, Safety and Health Assessments Protocol for Oversight Planning*, Appendix A, is intended to assist in identifying assessment functional areas.
- Enterprise-wide targeted nuclear safety assessments are selected using the systematic methodology specified in Protocol EA-31-03, *Office of Nuclear Safety and Environmental Assessments Protocol for Identification of Topical Areas for Enterprise-wide Targeted Nuclear Safety Assessments*.
- Site Leads shall develop and maintain SBNs and conduct routine site briefings in accordance with Appendix B. SBNs and routine site briefings are used to present pertinent site information (e.g., changes in site leadership, new projects or programs, major events or occurrences, current safety performance, planned oversight activities) to EA management and staff. SBNs may contain pre-decisional information and should not be widely distributed without EA management approval.

- Site Leads shall characterize the risk associated with nuclear facilities at their assigned site(s) using Appendix C.
- EA-31 shall use Protocol EA-30-02 to develop site-specific oversight plans (SOPs) that include planned assessments and operational awareness activities for their assigned site(s). SOPs are used by the Resource Loading and Integration Team (RLIT) to update the Resource Loaded Oversight Plan (RLOP). SOPs and the RLOP are revised as necessary to reflect the most accurate planning and scheduling of EA-31, EA-32, EA-33, and EA-34 assessments and operational awareness activities, except EA-33 oversight activities are not included in the RLOP.
- EA-31 assessment and operational awareness activities shall be performed in accordance with DOE Order 227.1, *Independent Oversight Program*, and applicable EA protocols, guides, and criteria and review approach documents.
- Site Leads shall be qualified in accordance with the *Job-Specific and Program-Specific Qualification Standards for the Office of Nuclear Safety and Environmental Assessments (EA-31)*.
- Site Leads shall maintain the capability to access assigned sites and facilities by fulfilling site security and training requirements, including General Employee Radiation Training (GERT), Radiation Worker Training, and HAZWOPER Training, as necessary.
- Site Leads should obtain access to their site’s internal information systems, including records pertaining to assessments and issues management, where feasible.

#### 4.0 RESPONSIBILITIES

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

- Designates Site Leads.
- In coordination with the Director, Office of Environment, Safety and Health Assessments, approves each Site Lead’s SOP(s).
- Coordinates with line managers to ensure the functionality of the Site Lead program and obtain feedback on performance.
- Maintains cognizance of the Site Lead program’s effectiveness and periodically evaluates performance to facilitate improvement.
- Coordinates site briefings to the Office of Enterprise Assessments management and staff.
- Ensures that Site Leads complete and maintain qualification in accordance with established protocols.

##### **Directors, Office of Worker Safety and Health Assessments, Office of Emergency Management Assessments, and Office of Nuclear Engineering and Safety Basis Assessments**

- Provide planned oversight activities to the Site Lead to support SOP development.

##### **EA-31 Site Lead**

- Maintains operational awareness of the assigned site(s), including the status of contracts, nuclear facilities safety basis, nuclear facility projects, major modifications or changes to nuclear facilities, schedules of oversight activities and assessments, significant issues, and the status of corrective

actions for significant findings. This should include routine communications (conference calls) with assigned site points of contact and periodic site visits. Appendix A provides a list of activities to consider.

- Based on information from operational awareness and oversight activities, establishes and maintains the SBN per Appendix B that provides a basis for oversight activities for the assigned site(s).
- Coordinates with DOE Field Elements to identify independent assessments, operational awareness activities, and schedules consistent with priorities for the next fiscal year.
- Coordinates Office of Nuclear Safety and Environmental Assessments visits to assigned sites, including independent assessments and operational awareness activities.
- Schedules, as needed, follow-up activities addressing findings and other issues, including selective use of assessments to review the timeliness and adequacy of corrective actions, verify and validate effectiveness, and confirm closure.
- Maintains a list of issues requiring follow-up, monitors the status of those issues, and coordinates follow-up activities.
- Provides site briefings in accordance with Appendix B to EA management and staff on key site issues, projects, changes, oversight strategy, activities, and follow-up items.
- Supports analysis of site-specific data for the identification of areas for broad targeted assessments in accordance with Protocol EA-31-03, as needed.
- Completes Site Lead qualifications within 18 months from assignment and maintains proficiency through continuing education, training, and focused oversight activities.
- Completes one-time and periodic training as necessary to ensure prompt, escorted site access during operational awareness and assessment visits.

## 5.0 REFERENCES

- DOE Order 227.1, *Independent Oversight Program*
- Protocol EA-30-02, *Office of Environment, Safety and Health Assessments Protocol for Oversight Planning*
- Protocol EA-31-03, *Office of Nuclear Safety and Environmental Assessments Protocol for Identification of Topical Areas for Enterprise-wide Targeted Nuclear Safety Assessments*
- Job-Specific Qualification Standard for the Office of Nuclear Safety and Environmental Assessments (EA-31)
- Program-Specific Qualification Standard for the Office of Nuclear Safety and Environmental Assessments (EA-31)

## **Appendix A**

### **Examples of Operational Awareness Information**

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#### **1.0 PURPOSE**

This appendix provides examples of the types of information that Site Leads should access to maintain operational awareness of their assigned site(s).

#### **2.0 APPLICABILITY**

This appendix applies to Site Leads.

#### **3.0 EXAMPLES OF OPERATIONAL AWARENESS INFORMATION**

- Documented safety analyses, technical safety requirements (TSRs), safety evaluation reports, safety design basis documents, justifications for continued operation (JCOs), and evaluations of the safety of the situation (ESSs)
- Status of nuclear facility safety bases implementation and associated activities
- Major modification determinations for existing hazard category 1, 2, 3 facilities
- Nuclear and non-nuclear hazardous facility status for startups and restarts
- Site annual assessment schedules (DOE line management and contractor)
- Site problem identification and resolution procedures and databases
- Safety issues identified by new information, potential inadequate safety analyses and/or unreviewed safety question determinations, JCO and ESS compensatory measures
- DOE line management and contractor assessments, reviews, surveillances, and audit reports (e.g., TSR implementation verification reviews, Federal annual integrated safety management system verifications, safety system oversight engineer and cognizant system engineer assessments, Chief of Nuclear Safety assessments, contractor assurance system program assessments, management self-assessments)
- Defense Nuclear Facilities Safety Board hearings, notional votes, correspondence, recommendations, staff visits, closeout briefings, staff issue reports, and weekly/monthly Resident Inspector reports
- Government Accountability Office, Office of Inspector General, Congressional Research Service, National Academy of Sciences audits, reviews, and investigations
- Occurrence Reporting and Processing System, Noncompliance Tracking System reports, Computerized Accident/Incident Reporting System (CAIRS), and the Nuclear Safety Information (NSI) Dashboard

- Office of Enforcement (EA-10) pending and issued enforcement actions
- Contractor assurance system performance metrics/indicators
- Federal delegations of safety authority and authorities having jurisdiction letters
- Exemptions from nuclear safety requirements and alternative safety analysis methodology submittals
- Results of quarterly nuclear facility project reviews and construction project reviews
- Environment, Safety and Health reporting by Headquarters program offices
- Safety culture information, including survey data (where available)



**Appendix B**  
**Developing Site Briefing Notes and Conducting Routine Site Briefings**

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**1.0 PURPOSE**

This appendix establishes the process for Site Leads to develop and maintain site briefing notes (SBNs) and to conduct routine site briefings to Office of Enterprise Assessments (EA) personnel. The goal of SBNs and routine site briefings is to present information about sites to EA management and staff in three main areas: (1) new and significant changes, projects, etc., (2) current safety performance, and (3) recommended assessment activities, along with associated bases and priorities, for the coming fiscal years. The information and analyses documented in SBNs support the independent assessment planning process defined in EA-30-02, *Office of Environment, Safety and Health Assessments Protocol for Oversight Planning*.

**2.0 APPLICABILITY**

This appendix applies to Site Leads, with input from other EA-30 personnel.

**3.0 REQUIREMENTS**

- Site Leads maintain SBNs for their assigned site(s) on a regular basis, updating the SBN as new information becomes available or conditions change.
- Routine site briefings are provided on a semi-annual schedule for sites with assigned Site Leads.

**3.1 Preparation of Site Briefing Notes**

<b>Actions</b>
<p><b>Site Leads</b></p> <ol style="list-style-type: none"><li>1. Using the SBN template located on EAShare as a guide, develop or update the SBN in coordination with EA-31, EA-32, EA-33, and EA-34 staff. The track changes feature of Microsoft Word is used to indicate updates to the SBN since the previous site briefing.</li></ol> <p>The requested information for most sections of the SBN is self-explanatory, and no additional guidance is required. However, the following additional instructions are provided:</p> <ol style="list-style-type: none"><li>2. Determine the scope (e.g., the entire site or a portion of the site) of the SBN based on the complexity of a site’s management configuration and include this information in the “Site” cell of section 1 of the SBN. The SBN may be prepared for each assigned DOE site, each program office within a site (e.g., Office of Environmental Management, Office of Science), or major contractor entity within a given DOE site. As a minimum, the main site designator shall be included on the SBN.</li><li>3. Include the following information in the “General Site Information” section:<ul style="list-style-type: none"><li>• Key milestones for design, construction, and startup of new nuclear facilities</li><li>• Important programs and projects with associated key milestones in existing nuclear facilities</li></ul></li></ol>

**Actions**

- Major modifications to nuclear facilities and significant changes to operations for a nuclear facility or activity
- Restart of existing nuclear facilities
- Significant changes in contracts or contractors
- Major budget changes
- Reductions in force
- Risk scoring for nuclear facilities, developed using the methodology in Appendix C of this protocol.

Additional information that amplifies and/or supports the “General Site Information” section may be captured in attachment A of the SBN.

4. Develop a list of significant issues associated with the implementation of nuclear or non-nuclear safety programs at assigned site(s). The “significant issue” terminology is used instead of “finding” because the deficient condition may be identified through review of site performance information/data and not necessarily through the conduct of a formal EA-30 assessment. However, significant issues should be considered equivalent to an EA-30 assessment finding for the purposes of oversight planning.
  - a. Identify the sources of information/data to be evaluated to determine the areas of concern with the site’s nuclear safety program implementation. Examples include:
    - Previous HS-45/EA-30 assessment reports and associated findings
    - EA enforcement actions and accident investigation reports
    - Daily plant status call
    - Facility Representative weekly reports
    - Occurrence Reporting and Processing System reports
    - Computerized Accident/Incident Reporting System (CAIRS) reports
    - Contractor assurance system monthly/quarterly/annual reports
    - A site’s periodic issues management meeting report of significant issues
    - Site integrated assessment plans
    - Startup notification reports
    - Readiness review reports
    - DNFSB site representative weekly reports
    - DNFSB periodic reports to Congress
    - DNFSB site visit reports
    - Open DNFSB recommendations.
  - b. Review the sources of information/data to identify condition(s) that indicate a “significant” issue (see examples below) associated with the implementation of a site’s safety basis or safety management programs (SMPs). A significant issue typically degrades the effectiveness of a safety basis hazard control or SMP to the extent that it is no longer able to fully meet its credited safety function, potentially impacting the risk that has been accepted through the approved safety basis. Determination of the significance of a particular issue in many cases will rely on the professional judgment of the Site Lead based on an understanding of the safety basis, consultation with subject matter experts, and discussions with site personnel.

**Actions**

For the purposes of evaluating the sources of information/data to identify issues, the identification should be based on situations where there is a non-compliance with a requirement that has resulted in performance problems associated with the implementation of a safety program, etc.

Examples of conditions that may be considered significant include:

- A programmatic breakdown in the SMP, such as multiple non-compliances with SMP procedure(s)
- Widespread training weaknesses or personnel knowledge gaps associated with the implementation of a safety basis document
- A technical safety requirement violation
- Resolution of 10 percent or more of the open issues in the issues management program is greater than 6 months past due
- Configuration management documentation or technical basis for a safety structure, system, or component (SSC) does not adequately reflect the safety system configuration and operating parameters to fulfill the safety basis functional requirements
- The material condition and reliability of a safety SSC have degraded due to a backlog of required corrective or preventive maintenance activities.

c. Develop a concise statement for each significant issue identified, including the following additional information:

- The assessment functional area (from Protocol EA-30-02, *Office of Environment, Safety and Health Assessments Protocol for Oversight Planning*, appendix A) with which the issue best aligns
- The basis for the issue significance, including a discussion of the requirement not met, the effect on applicable defense-in-depth barriers credited in the safety bases, and the impact to the effectiveness of the SMP
- A discussion of the site's actions and schedule to resolve the condition(s) causing the significant issue, including the current status of actions.

Multiple similar significant issues associated with one element of the defense-in-depth barriers credited in the safety bases may be rolled up into one significant issue statement.

5. In the "Status of EA Findings" section, provide the number of EA-30 findings that have been:

- Identified in the previous five years.
- Closed by the site. When designating a finding as "Closed" in the SBN, obtain the opinion of the Federal site office on finding status. A site office may want to verify closure before a finding is officially determined to be closed even though the M&O contractor's tracking system identifies the finding as "Closed."
- Reviewed by EA for adequate closure. These are findings that have been indicated "Resolved" by the Federal site office/M&O contractor, and the closure evidence has been reviewed by EA to verify the effectiveness of the resolution.
- Determined by EA to be effectively resolved by the site. EA's verification of the effectiveness of the resolution should be documented in an EA assessment report.

In addition, provide a brief discussion on the strategy to verify effective resolution of EA findings that have not been reviewed. Provide a listing of the open and closed EA findings for the previous five years in the SBN.

6. In the SBN, section 5, *Oversight Strategy*, discuss the basis behind the selection of oversight activities. The strategy discussion is a summary of why oversight activities were chosen, and how

<b>Actions</b>
<p>priorities were assigned to the oversight activities. The SOP lists the planned oversight activities by EA-31, EA-32, EA-33, and EA-34, as appropriate.</p>
<p>7. Submit the SBN to EA-31, EA-32, EA-33, and EA-34 Directors for review and incorporate any input or feedback.</p>
<p>8. Final updated SBNs are maintained in the O Drive (O:\EA31\Site Lead Briefings- Thursday).</p>

### 3.2 Routine Site Briefings

Routine site briefings occur on a year-round schedule consisting of a site or group of sites being briefed typically every two weeks. These site briefings are scheduled to allow for all applicable sites to be briefed at least semi-annually, and the emphasis is on changes since the last briefing.

<b>Actions</b>
<p><b>EA-31 Director</b></p> <p>In consultation with the EA-30 Deputy Director, establish the schedule for conducting the routine site briefings.</p>
<p><b>EA-30 Administrative Staff</b></p> <p>Schedule the site briefings and notify applicable staff. There should be at least two site briefings for each site or group of sites during a fiscal year.</p>
<p><b>Site Leads</b></p> <ol style="list-style-type: none"> <li>1. Coordinate with EA-31, EA-32, EA-33, and EA-34 personnel to prepare for the site briefings.</li> <li>2. Present the SBN at the scheduled site briefing for assigned sites, with support from EA-31, EA-32, EA-33, and EA-34 staff. The expected outcomes from the site briefing are the following:                     <ul style="list-style-type: none"> <li>• Provide EA management and staff with an update on the current status of operations and safety performance at the site</li> <li>• Discuss the oversight strategy and the planned oversight activities for the site (attachment D of the SBN)</li> <li>• Identify any action items from the site briefing.</li> </ul> </li> <li>3. Finalize the SBN following the site briefing:                     <ul style="list-style-type: none"> <li>• Capture the action items discussed in the site briefing</li> <li>• Update the SBN by incorporating tracked changes and any directed changes during the site briefing. This becomes the new baseline SBN.</li> <li>• Provide the updated SBN to the administrative staff for inclusion on EAShare.</li> </ul> </li> </ol>

#### **4.0 RESPONSIBILITIES**

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

- Ensures that applicable staff support the development of the SBN
- Ensures that the SBN is sufficiently detailed to support the site briefing
- Establishes the site briefing schedule.

##### **Site Leads**

- For assigned site(s), prepare or update the SBN in coordination with EA-31, EA-32, EA-33, and EA-34 staff
- Participate in scheduled routine site briefings for assigned sites to communicate applicable site information and proposed assessments.

## Appendix C Site and Facility Risk Scoring Process

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### 1.0 PURPOSE

This appendix establishes a methodology to determine a DOE risk value for hazard category 1, 2, and 3 nuclear facilities, which allows for risk scoring of the nuclear facilities at a site.

### 2.0 APPLICABILITY

This appendix applies to Site Leads.

### 3.0 REQUIREMENTS

A DOE risk value for a single facility is determined by calculating the product of the values from the elements discussed below. The DOE risk values for multiple facilities may be compared to develop a risk scoring of the facilities.

1. Determine the **Initial Value** associated with the facility from the table below:  
*Only hazard category 1, 2 or 3 nuclear facilities need to be ranked. Rank others at your discretion.*

Facility hazard categorization	Initial Value
Hazard Category (Haz Cat) 1	40
Haz Cat 2, with Safety Class Controls	35
Haz Cat 2, without Safety Class Controls	30
Haz Cat 3	25
Less than Haz Cat 3	20
New, uncategorized facilities	Determined by Site Lead

2. **Material Condition** (0.9 – facility is new and material at risk has not yet been introduced, 1 – facility is in good repair and as-built drawings are mostly accurate, 1.1 – a few long-term degraded conditions and some as-built drawings are not updated to reflect current configurations, 1.2 – numerous long-term degraded conditions and as-built drawings are unavailable or inaccurate). There is room for judgement in this factor.
3. **Activity Level** (0.9 – inactive facility, 1 – infrequent activity, 1.1 – moderate activity, 1.2 – frequent or new activities)
4. **High Level ORPS** (1 – zero High Level reports in ORPS for the facility for the year, 1.1 – one or two High Level reports in ORPS for the year, 1.2 – three or more High Level reports in ORPS for the year)
5. **Contractor Trend** (1 – decreasing trend in ORPS reports for the contractor over 5 years, 1.1 – steady trend over 5 years, 1.2 – increasing trend over 5 years)
6. **EA-31 Report Findings** (1 – no deficiencies and no findings in the latest report, 1.1 – at least one deficiency and no findings, 1.2 – at least one finding)

7. **Facility Risk Value** is calculated as the product of factors 1 through 6 above.
8. **Mission Need Factor** (1 – facility has a minor role in DOE’s overall mission, 1.1 – moderate role, and 1.2 – major role). There is room for judgement in this factor.
9. **DOE Risk Value** is calculated as the product of the Facility Risk Value and the Mission Need Factor.