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

PROTOCOL – EA-30-00
Revision 6

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Office of Enterprise Assessments
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OFFICE OF ENVIRONMENT, SAFETY AND HEALTH ASSESSMENTS PROTOCOL FOR OVERSIGHT ACTIVITIES

1.0 PURPOSE

This protocol establishes the processes for conducting Office of Environment, Safety and Health Assessments (EA-30)-led oversight activities as required by U.S. Department of Energy (DOE) Order 227.1A, *Independent Oversight Program*. These activities are the primary means of gathering data to support the independent oversight function as directed by the Secretary of Energy or requested by Department line management.

2.0 APPLICABILITY

This protocol applies to assessments, studies, analyses, topical area evaluations, 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*.

3.0 REQUIREMENTS

General

This protocol provides the requirements and guidance for assessments, studies, analyses, topical area evaluations, and operational awareness activities. Exceptions to the requirements may be made for highly unique activities, with the approval of the EA-30 Tier-1 (T-1) Director. Teams should use the guidance in appendices A and B, 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. Individuals in "acting" positions may perform the activities for that position, and responsibilities may be delegated when necessary.

- 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.
- The Team Lead 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 Lead 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 and controlled.

- EA-30 oversight reports must document significant and validated observations from oversight activities and appropriately identify findings and/or deficiencies consistent with DOE Order 227.1A.

- When there are unresolved differences in the scheduling of activities, the factual accuracy of the report, or comment resolution with the organization being reviewed, these differences must be 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 (e.g., DOE Orders, Standards, etc.) between the team and the assessed organization.

- 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.

- The Team Lead ensures that assessment records and documents are entered into the record management system (DocShare), as described in appendix E.

- As requested, the Team Lead will briefly discuss the scope, key results from the activity, lessons learned, and potential process improvements for future oversight activities (typically during a staff meeting and/or site lead briefing).

- Findings from an assessment activity must be tracked and managed in accordance with the *Protocol for Findings Management*, Protocol EA-30-03.

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 C.

- All assessments are to be conducted in accordance with an approved assessment plan and the applicable EA Criteria and Review Approach Documents |Department of Energy (CRADS). CRADs from DOE Guide 226.1-2A, *Federal Line Management Oversight of Department of Energy Nuclear Facilities*, (Appendices of DOE G 226.1-2A | Department of Energy) may be used instead of or in addition to the CRADs. Deviations from this protocol or the CRADs should be identified and justified in the assessment plan.

Planning and Coordination

- EA-30 develops the draft assessment plan using the template, *EA-30 Plan TEMPLATE,* found in EAShare on the EA-30 page.

- EA-30 provides the draft assessment plan to the DOE point of contact (POC) for review and comment, with an offer to the DOE site/field/program 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 POC before the team's inbrief:
  - The assessment plan is developed, and upon approval, provided to the POC.
  - Documentation is requested, provided, and reviewed to the extent practical.
  - Initial interview topics are developed by the team.
  - Tours, interviews, and surveillances of work and training are scheduled (if applicable).
  - Site counterparts (subject matter experts) are identified.

- A team workspace is reserved, site access and information technology requirements are met, and/or required training is scheduled (if applicable).
- Logistics are finalized regarding the time, location, and attendees for daily, inbrief, and outbrief meetings.

▪ EA-30 plans and schedules an inbrief to be held after the team arrives at the site or begins remotely conducted assessment activities. Invitees should include the DOE site/field/program office manager, contractor management representatives, primary contacts, and counterparts. Defense Nuclear Facility Safety Board staff are welcome, at the invitation of the assessed organization, for inbriefs of assessments involving defense nuclear facilities. The agenda should include team introductions, an overview of the team's plans, confirmation of assessment activities (e.g., surveillances of training and planned work and interviews), and the expectations for finding follow-up. The inbrief may be the first time some attendees have interfaced with EA, and the inbrief should introduce EA as an asset for continuous improvement. A slide template including boilerplate language for inbriefs and outbriefs, *Briefing Powerpoint Template*, is found in EAShare on the EA-30 page.

▪ For concurrent assessments, EA-30 coordinates its briefings with other review officials. For concurrent assessments with the DOE site/field office or other entities such as DOE Headquarters program reviews or external reviews, the Team Lead 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.

<u>Conduct of the Assessment and Closeout Briefings</u>

▪ Preliminary observations based on initial documentation reviews should be drafted for internal team discussion and validation. For other assessment processes focused on initial document reviews, written comments and line management responses are demonstrated to be an effective means of issue identification and coordination with line management and may be used in lieu of this item. From the very beginning of the document review portion of the assessment, team members must maintain a history of documents reviewed.

▪ The Team Lead periodically briefs the cognizant EA-30 office director 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).

▪ The team conducts periodic briefings (typically daily if onsite, and weekly if remote) with site representatives to discuss overall status and preliminary observations. To maximize transparency and effective communication, these briefings are typically aligned with team meetings.

▪ While conducting the assessment activities either onsite or remotely, team members should periodically discuss with their site counterparts the scope, the team's data and observations, and potential findings or deficiencies. Team observations must be based on applicable requirements, standards, and/or guidance, and team members should clearly document the basis (e.g., citing the requirement not met) to their counterparts to prevent them from being dismissed as simply personal perspectives.

▪ Upon completion of the onsite assessment or the "data collection" for a remote assessment, 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/or negative observations. Team leads should provide site Federal leadership with the option of a separate outbrief. Briefing slides and concluding remarks should emphasize the factual accuracy review (FAR) schedule and the timeline for EA-30's resolution to ensure site management is aware of necessary management and staff resourcing required to accomplish the review as scheduled (e.g., five business days). The team should also discuss the requirements and the Department's expectations for the Federal and contractor element regarding addressing findings and deficiencies identified in the final assessment report. A *Briefing PowerPoint Template* is found on the EA-30 page in EAShare.

- One to two weeks prior to the outbrief meeting, the Team Lead requests the EA-30 Administrative Team to work with EA-1 Administrative Staff to schedule a 30-minute backbrief meeting with EA leadership to highlight their work and share their observations. The backbrief should be scheduled the week after the outbrief, or as soon as practical. The backbrief meeting should provide an informal, high-level summary of the assessment and a description of the results, including both strengths and weaknesses. Areas of weakness that may result in findings and deficiencies should be highlighted.

Preparing the Assessment Report

- Delivering high-quality and timely assessment reports is a critical aspect of the assessment process. EA reports are expected to describe the results of the assessment clearly and concisely in a manner that is useful to the recipient and EA's broad set of additional stakeholders (e.g., senior Departmental leaders, Congress, and the American public). While quality is the overriding driver, assessment reports must also be prepared in a timely manner to maximize the value of the assessment to the recipient.

- To promote report quality, reports will be developed and reviewed using the following major processes:
  - Team report writing, peer review, and Technical Writing Advisor (TWA) review
  - MRB
  - FAR by the recipient organization
  - Technical editing review
  - Quality Review Board (QRB)
  - Final management review and concurrence.

- **Procedural Requirements**. The report writing procedure contained in appendix B of this protocol will be used to develop all EA-30 assessment reports. The procedure establishes the required series of steps and timelines to complete the submittal of the final draft report to the EA front office within 60 business days from the completion of the onsite assessment (or completion of assessment data collection if a remote assessment). Appendix B addresses all major report writing processes listed above, as well as steps for related management reviews. As necessary, alternative procedures to appendix B may be used as approved by the T-1 office director.

- **Early Start to Report Writing**. A key ingredient to the successful development of an assessment report is early planning and report writing. Building in report quality early in the assessment process will result in timelier and more efficient team and management reviews. The Team Lead, assisted by the Lead Report Writer as applicable, should develop a strategy for report writing early in the assessment planning process. This includes clear assignment of writing responsibilities, writing schedules, and other expectations related to report development. The Team Lead should develop a "report shell" from the *EA-30 Report Template* for team members to populate with a preliminary outline of their assigned sections that is reflective of assigned CRADs. When the assessment is complete, the Team Lead should consider arranging a meeting for each team member to present their report section outline for team discussion and feedback, with the goals of enhancing assessment planning, identifying potential gaps or areas of overlap, and stimulating teamwork. The following are considerations for team members as they prepare for and conduct the assessment with the final report in mind:

- Populate assigned report section(s) at the beginning of the assessment planning phase and update it on an ongoing basis as information from the data call is analyzed.
- Identify gaps in information early and ensure that planned assessment activities will satisfy all information gaps and CRADs.
- During data collection phases of the assessment, refine report sections frequently. Adjust assessment activities to address identified knowledge gaps.

Following this process will help each team member to have, by the completion of the data collection, near-complete report input that covers all aspects of assigned CRADs and is organized in a logical flow consistent with the EA-30 report template.

- **Forecasting Report Development and Review Activities**. Based upon the planned date for the completion of the onsite assessment/data collection, as established in the assessment plan, the Team Lead supported by the EA-30 Administrative Staff will create a forecast for the timing of the various stages of assessment report writing and review using the timeline established in appendix B. The forecast enables the staff and management resources necessary for report development to be planned and scheduled reliably. The Team Lead will communicate changes to the forecasted dates to the EA-30 Administrative Team as soon as possible. Because the TWA supports every EA-30 assessment, it is especially important for Team Leads to notify the TWA of anticipated review schedules as soon as possible so that adequate time can be reserved on the TWA schedule, which is posted on EA-30's Teams channel.

- **Use of Information Technology Collaboration Tools**. Collaboration tools (e.g., Microsoft Teams, SharePoint, OneDrive) are available on the DOE Energy Information Technology Services (EITS) network that can be used to enhance and expedite assessment planning, conduct, and report writing. These tools facilitate remote team communications and offer a platform for multiple contributors to simultaneously develop and edit assessment documents and reports. Assessment team members and EA-30 managers should use these tools to increase the efficiency of reviews and comment resolution in all phases of report development. In addition, use of these tools facilitates post-review records management. Use of email attachments is discouraged for this reason, but when necessary to use, it is recommended that the emailed attachment be immediately added to the assessment team's chosen collaboration tool.

- **Team Report Writing**. The Team Lead is expected to facilitate timely development of a high-quality draft assessment report conforming to established templates and guidance documents. Team Leads should ensure that team members have sufficient dedicated time to support the report writing phase of the assessment. It is important that team members develop polished narrative input for their assigned areas. The Team Lead or Lead Report Writer (if one is designated by the Team Lead) compiles the input into a complete draft report. Designation of a Lead Report Writer leverages the talents of team members who are experienced technical writers and frees up the Team Lead to focus on the most important assessment results and attend to other assigned responsibilities. The Team Lead orchestrates peer reviews by the team members and review by the TWA. The TWA supports the team in maturing the draft report and ensuring it conforms to templates and report writing standards. Once satisfied that the report meets quality standards, the Team Lead provides it to the MRB.

- **Management Review Board**. EA-30 uses an MRB to review draft reports prior to being released outside of the organization for site FAR. The MRB is intended to subject the draft report to a management level review, focusing on report clarity, logical flow and presentation, defensibility of conclusions (e.g., findings, deficiencies, OFIs), and adequacy of the executive summary in communicating an accurate, high-level representation of the purpose and outcomes of the assessment understandable by senior leaders and many external stakeholders. The MRB is composed of the EA-30 Tier-2 (T-2) office director sponsoring the assessment and another T-2 office director within EA-30, selected by the sponsoring T-2 office director based on both availability and experience applicable to the draft report. In addition, the sponsoring EA-30 T-2 office director, in consultation with the EA-30 Deputy Director, may elect to expand MRB membership on an as-needed basis to include EA-30 staff with applicable experience, the EA-30 Deputy Director, the EA-30 Director, or a senior manager from EA's support service contractor.

- **Factual Accuracy Review**. Upon resolution of the MRB comments, the Team Lead will provide the report to the site for FAR. The Team Lead will provide the draft report (in a PDF file format with line numbers) and a comment resolution matrix based on the *Factual Accuracy Comments on Draft Report Template* (in Microsoft Word format) to the assessed site/organization field element for FAR. Upon receipt of the FAR comments, the Team Lead will evaluate the comments, engaging team members as necessary. The Team Lead will carefully consider all FAR comments and make appropriate changes to the draft report to improve its accuracy. Comments that are submitted that are not pertinent to the factual accuracy of the report, such as comments on the team's analysis and overall conclusions, should be considered only if they have merit and improve the report contents. The Team Lead will update the comment resolution matrix indicating how each comment was addressed. After a verification review by the T-2 office director, the Team Lead will provide the updated comment resolution matrix to the site and offer a briefing on how their comments were resolved.

  Beginning at this stage and as necessary moving forward, the Team Lead should also request that the appropriate person in the DOE office conduct a derivative classification review, as well as a review for the presence of CUI, and identify possible changes to allow the report to be released with as few safeguarding or dissemination controls as practically possible (e.g., public release). The Team Lead should use conservative discretion regarding the need for additional derivative classification and CUI review beyond the first review.

- **Technical Editing Review**. Simultaneous with the FAR review, the Team Lead will submit the draft report (in a clean Microsoft Word file format) to the TWA for transmittal to the independent oversight support service contractor Publications Team for a comprehensive technical editing review. The technical editing review will ensure that the report is grammatically correct and meets EA's style guide. When incorporating selected technical editing review comments, the Team Lead should ensure that the meaning or context of the report is not unintentionally changed.

- **Quality Review Board**. EA-30 follows the EA Business Policy, *Quality Review Boards*. QRBs are conducted on a final draft, after site FAR and technical editing, that the EA-30 Director deems ready for review. The EA Deputy Director serves as an advisor to all QRBs. The EA-30 Director serves as the Chair of the QRB and is supported by rotating staff members, and the EA-30 support contractor Project Manager. The Team Lead should consider QRB member comments and accept and address those comments that improve the contents and messaging of the report. Comments and changes that would undermine the accuracy or validity of the report should not be accepted, although clarification may need to be added to the report to prevent confusion. By developing detailed responses when adjudicating QRB comments, the QRB session will require less discussion. If necessary, the QRB Advisor will facilitate the resolution of comments.

- **Final Concurrence Review**. Upon acceptance of the report by the QRB Chair, the Team Lead will prepare an updated final draft of the report. The final draft will be routed by the EA-30 Administrative Team within the DocShare tool to the responsible office director, EA-30 Deputy Director and EA-30 Director for final review and concurrence. Upon the concurrence of the EA-30 Director, the EA-30 Administrative Team will forward the final draft report for submittal to the EA front office.

- After review by the EA Director and Deputy Director, the Office of Resources, Communications and Analysis (EA-40) provides the final draft report to the applicable Program Secretarial Office (PSO) for coordination prior to the report being finalized, distributed and posted on EA's website. In some instances, additional feedback may be received from the PSO that needs to be addressed before the report is finalized.

- The associated DOE line organization receives an electronic copy of the final report as an attachment to a transmittal memorandum, typically from the EA-30 T-1 Director. Selected reports, such as complex-wide reports involving multiple program offices, may be issued with a transmittal memorandum from the EA-1 Director, at the discretion of EA-1. 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.

- Records related to each EA-30 assessment must be managed consistent with the requirements established in appendix E of this protocol.

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 manner 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.

Analyses and Topical Area Evaluations

An analysis may be conducted to influence oversight strategy, provide risk-informed assessment targeting, or to inform follow-on assessments. Topical area evaluations are different from analyses in that they provide a detailed look at safety data across the DOE complex. Topical area evaluations, also known as "deep dives," provide complex-wide performance analysis to identify relative weaknesses site-to-site or facility-to-facility.

- The scope and strategy for an analysis or topical area evaluations are defined within a Plan of Action and Milestones (POAM) item, outlined in another protocol, or may be established by management.

- The team or individual may request information from field sites or contracting organizations, or may review previously published data only (e.g., ORPS reports).

- The results of an analysis or topical area evaluation will be documented in a field note, including the scope of the effort, the method(s) used, and the conclusions reached as a result. Findings, deficiencies, and best practices are not identified as a part of an analysis or topical area evaluation, and if information reviewed suggests a non-compliance, another assessment activity should be created.

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. They usually do not require a documented plan or the use of CRADs, although the lead may choose to add formality if beneficial.

- 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 inbrief 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).
- If during an operational awareness activity a condition is noted which may constitute a non-compliance or other area of concern, the lead should consult the cognizant T-2 director.
- The field note is provided to the cognizant EA-30 T-2 office director and EA-30 T-1 Deputy Director for review, approval, and release for entry into the DocShare tool.
- In most cases, the field note should be provided for review and approval within two weeks of the conclusion of the associated activity. Exceptions to this two-week window should be communicated to the T-2 office director (e.g., competing priorities, such as a field note that is generated concurrent with an assessment report).
- If the field note is used to document an analysis or only to close an action owned by a single T-2 office, the EA-30 Deputy Director may delegate approval authority to the EA-30 T-2 office director.
- Field notes do not require formal management approval in the DocShare tool.
- Finalized field notes are retained in the Field Notes folder in the DocShare tool.

4.0 RESPONSIBILITIES

T-1 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 Lead 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.
- Chairs QRBs and concurs with the resultant reports via the DocShare tool.
- Reviews and approves reports for submittal to the QRB and prior to submittal for EA front office review/approval.
- Provides a final quality check before delivering the report to the responsible DOE site/field office or project manager (or designee) under a signed transmittal memorandum.
- Works with line management to resolve any differences regarding the schedule of activities or the factual accuracy of the draft assessment report that cannot be resolved by the cognizant EA-30 T-2 office directors. Differences that cannot be resolved are raised to the EA-1 Director (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 DOE 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.

T-1 Deputy Director, Office of Environment, Safety and Health Assessments

- Reviews draft assessment reports prior to the QRB, and entry into the EA correspondence tracking 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.

T-2 Directors, Office of Nuclear Safety and Environmental Assessments, Office of Worker Safety and Health Assessments, Office of Emergency Management Assessments, and Office of Nuclear Engineering and Safety Basis 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 Leads 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 T-1 Director and Deputy Director and the EA-1 Director and Deputy Director.

- Accept, amend, or reject the draft report for transmittal by the Team Lead to the DOE site/field office POC to review for factual accuracy and/or review for the presence of classified information 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 DocShare tool.

- Resolve any differences regarding schedules of activities or the factual accuracy of the draft assessment report that arise with line management and cannot be resolved by Team Leads. This includes technically complex or highly sensitive issues that require deliberation outside of the normal appendix B timeline. When differences cannot be resolved, raise them to the EA-30 T-1 Deputy Director and/or Director.

- Evaluate feedback and lessons learned from oversight activities for process improvements.

- Consistent with appendix E, review EA assessment records annually and determine the records that are scheduled for transfer to the National Archives and Records Administration or for destruction.

Team Lead

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

- 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 T-1 Director and EA-30 contractor management.

- Coordinates with the DOE site/field office POC to provide assigned team members with information on site safety and security requirements, including security clearance requirements, limitations on use of personal electronic equipment, requirements for site computers and LAN access, required training, and PPE needs. Identifies and communicates to team members the protection requirements for classified information and CUI associated with the activity.

- When possible, coordinates for team to remotely attend site/facility Plan of the Day meetings during the week prior to onsite periods to inform potential work observations.

- Leads the inbrief, daily briefings, and outbrief for the activity.

- Provides the outbrief closeout summary via the cognizant EA-30 T-2 office director to the EA-30 T-1 Deputy Director.

- Provides periodic status briefings and the closeout summary to the cognizant EA-30 T-2 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 T-2 office director (per DOE Order 227.1A).

- 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.

- Reserves time with the TWA for quality review and technical editing services using the TWA calendar. The calendar is posted under the EA-30 Assessment Activities Team in the TWA Calendar channel under "Files." If needed, TWA dates are already reserved for another activity, coordinate with the EA-30 Deputy Director and/or the EA-30 Director for resolution based on prioritization. Monitors the status of report development and recommends actions to the cognizant EA-30 T-2 office director as necessary to meet the:
  - schedule, as stated in the assessment plan, for the MRB review, FAR (by the DOE site/field office), and the QRB review
  - EA report completion performance goals.

- Coordinates with EA-30 Administrative Staff for scheduling the QRB per the EA Business Policy – *Quality Review Boards*. The QRB is scheduled following the outbrief. Provides subsequent confirmation of meeting the QRB schedule at time of submission of the report for FAR and technical editing.

- Submits report to cognizant EA-30 T-2 office director and EA-30 Administrative Staff for submission to the QRB per the EA Business Policy – *Quality Review Boards.*

- Represents the team's assessment, findings, and recommendations to the QRB and resolves QRB comments. Presents any technically complex or highly sensitive issues to management that require special consideration outside of the normal appendix B timeline.

- When differences regarding the factual accuracy of the draft assessment report arise that cannot be resolved, raises the issues to the cognizant EA-30 T-2 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 EAShare.

- Uploads the report package, including transmittal memorandum, report, FAR table, and listing of key documents reviewed, interviews, and observations into DocShare.

- Works with EA-30 Administrative Staff to ensure that findings from the oversight activity are entered into the EA-30 findings matrix database.

- Manages assessment records in accordance with appendix E.

Team Members

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

- 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 Lead 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 OFIs as directed by the Team Lead.
- Peer review other team members' work as directed by the Team Lead.
- 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 FAR.
- Provide the Team Lead with lessons learned and potential process improvements for future assessment activities.

Site Lead (assigned to nuclear facilities)

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

EA-30 Administrative Staff

Supports the Team Lead as follows:

- Provides administrative support as needed, including express labels for shipment of documents and data from the onsite location to team members' offices if necessary.
- Maintains the assessment activities in the EA-30 Calendar, the EA Weekly, and Report Tracker in EAShare and DocShare as appropriate.
- Updates milestones for each onsite activity in Report Tracker in EAShare as they occur.
- Coordinates scheduling the QRB at the request of the Team Lead and approval of the EA-30 T-1 Director per the EA Business Policy – *Quality Review Boards.*
- Reviews and verifies the email distribution list for the distribution of the report from the transmittal memorandum for the corresponding report.
- Coordinates posting of the report on the EA website two business days after electronic distribution of the report. (Note: Field notes are not posted to the EA website.)

- Updates the EA-30 findings matrix database.

- Verifies and provides assistance when needed for entry by the Team Lead of documents pertaining to the onsite activity into DocShare, 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.

- Provides support in managing assessment records consistent with the requirements in appendix E of this protocol.

EA Technical Writing Advisor

- Recommends changes to the Team Lead for the assessment report. Works with Team Leads 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 Lead with editorial enhancements to improve report clarity. If the Team Lead 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 Lead's discretion.

- Coordinates EA-30 technical edits through the EA support contractor editors once the Team Lead has determined in coordination with the cognizant T-2 Office Director 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 Lead 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. 1*, dated April 29, 2021
- EA Business Policy – *Quality Review Boards, Rev. 1,* dated January 27, 2022
- Protocol EA 30-03, *Office of Environment, Safety and Health Assessments Protocol for Findings Management*

6.0 APPENDICES

A. Team Oversight Activities and Schedule
B. Procedure for Preparing EA-30 Assessment Reports
C. Types of Oversight Activities
D. Involvement of Augmentees in EA Assessment Activities
E. Records Management

APPENDIX A
Team Oversight Activities and Schedule

This appendix documents the best practices for effectively assessing and documenting typical oversight activities in a timely manner. Team Leads 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 Leads 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, and 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. In this appendix, the inbrief is used as a reference point in time. For assessments with an onsite portion, the inbrief usually is scheduled the first day on site. For remote assessments, the inbrief usually occurs before the bulk of the interviews conducted for data gathering.

Four to eight weeks before inbrief for oversight activity (depending on the oversight activity's scope, depth, constraints, and complexity)	**The Team Lead:** ▪ Contacts the selected 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 Lead visiting the site during a scoping visit. Additionally, the Team Lead should offer the DOE site/field office manager a teleconference with EA-30 management, the Team Lead, and the EA-30 site lead (participation is optional) to discuss aspects of the oversight activity that the DOE 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 D. ▪ Finalizes the schedule for the data collection visit(s). Schedules the TWA review and Columbus Tech Edit with the TWA.
Two to four weeks before inbrief for oversight activity	**The Team Lead:** ▪ 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.
	▪ Coordinates with the EA-30 Administrative Team to establish:
	  • Timeline tracking in accordance with appendix B
	  • An MS Teams folder for team members' use
	  • A DocShare folder for the assessment.
	▪ Establishes the "report shell" for team members to initiate the population of data in assigned sections. (Lead Report Writer, if assigned)
	▪ Completes Introduction and Methodology sections of report shell. (Lead Report Writer, if assigned)
	
	Team Members:
	▪ 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).
	▪ Review and analyze the initial available documentation and propose to the Team Lead data collection plans to assess their assigned areas using the CRADs.
	▪ Using the established report shell, initiate entry into assigned sections based on preliminary document reviews and planned topics for review.

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.

Within one week before inbrief for the oversight activity	**The Team Lead:** ▪ 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. ▪ Along with the T-2 director, briefs the EA-30 director (and/or deputy, as available) on the scope, status, and schedule for the upcoming data collection portion of the assessment. **Team Members:** ▪ 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 Lead. ▪ Provide a written summary of their observations identified to date for the Lead Report Writer's (if assigned) and the Team Lead's review no later than the Wednesday before the final onsite data collection and validation period for the oversight activity. ▪ Provide the Team Lead, 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. ▪ Continue to update the established report shell with supporting material for previously identified issues and new discovery.
During planning and initial data collection, if used	**The Team Lead:** ▪ Leads an inbrief, 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. **Team Members:** ▪ 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 Lead on assessment results during team meetings. ▪ Continue to update the established report shell with supporting material for previously identified issues and new discovery.
During the final data collection and validation period for the oversight activity NOTE: The date of the outbrief starts the clock to meet EA-1's 60-day goal if all data has been collected. Otherwise, the day of final data collection starts the clock.	**The Team Lead:** ▪ 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. ▪ Verifies with the site that all information to be used in the report as well as notes and material to be removed from the site has been reviewed for classified and CUI (including UCNI) content. ▪ 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 Lead 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. Schedules backbrief with EA-30 administrative staff.

	▪ Confirms date of final outbrief in Report Metrics Form for the EA-30 Administrative Team in order to update Report Tracker. **<u>Lead Report Writer</u>** *(as assigned; any unassigned tasks are performed by the Team Lead or team members as directed):* ▪ 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. ▪ Implements the tasks identified in step 1.2 of appendix B. **<u>Team Members:</u>** ▪ Ensure that all required data/information has been obtained by established end of data collection. ▪ For each aspect of the assessment plan and associated CRAD, verify that all assigned areas have been covered. ▪ If all areas have not been covered, verify with Team Lead that any gaps are acceptable. ▪ 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 Lead, 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 Report Writer's (if assigned) or the Team Lead's review by the deadline established by the Team Lead. ▪ Continue to update the established report shell with supporting material for previously identified issues and new discovery. ▪ Review the portions of the report written by their peers as requested by the Team Lead. ▪ Transition to appendix B for the writing, review, and approval of the assessment report.

Oversight Activity Reporting The report writing process for assessment reports is detailed in appendix B.

APPENDIX B
Procedure for Preparing EA-30 Assessment Reports

This appendix contains instructions for preparing EA-30 assessment reports. This procedure establishes the processes and timelines of the various stages of report development and review leading up to the submittal of the final draft report to the Office of Enterprise Assessments Front Office for review and approval. Exceptions to these procedural requirements must be approved by the EA-30 Director.

A critical element of the report development process is the collection of data associated with timeliness. Imbedded in this appendix are timeline data points annotated with a star (★) that identify points where dates are recorded in the Report Metrics Form to monitor progress against the model timeline identified in this appendix. Days are measured in business days.

Initial Conditions

- Team Lead has established clear expectations for report responsibilities, deliverables, and due dates and designates a Lead Report Writer, if so desired.

- The team has confirmed that all activities necessary to meet the expectations set by the assessment plan and identified CRADs have been completed.

- Team Lead has verified that the assessment report will not need to include classified information and determined the potential for CUI to be included in the report. If necessary, Team Lead has provided instructions to team members to conservatively mark and protect the draft report pending formal derivative classification review and review for the presence of CUI.

- Team Lead will use unique and descriptive file names for the drafts of the report at different stages (e.g., IA of [scope] at [site] - TWA draft)

- Using the "end of data collection" date as established in the assessment plan, the Team Lead has coordinated and scheduled the following:

  - Microsoft (MS) Teams folder for report writing to include all templates required for the administrative records as well as the initial report shell
  - Technical Writing Advisor (TWA) review
  - Support service contractor Publications Team (coordinate with TWA)
  - Factual Accuracy Review (FAR)
  - Management Review Board (MRB)
  - Quality Review Board (QRB) per business policy, *Quality Review Boards.*

★ - Data collection is complete. Timeliness goals for report development begin upon completion of the outbrief or data collection. Record date in the Report Metrics Form. **(T=0 business days)**.

Procedure Steps

1. Create Initial Draft Report (step duration 5 business days, not including travel days; T+5)

NOTE: The Team Lead has the flexibility to authorize additional time to produce the initial draft report (e.g., T+7) if the additional time is needed due to the complexity of the assessment/assessment results or logistical challenges.

1.1 Team Members

1.1.a When writing report input, cross reference content with assessment plan and CRAD to ensure alignment.

1.1.b Validate that conclusions of report input align with the outbrief.

- Any areas not aligned with the outbrief should be discussed with Team Lead.

1.1.c Include in report those areas determined to be deficiencies, opportunities for improvement (OFIs), findings, best practices, and recommendations.

- Validate the categorization of results consistent with DOE Order 227.1A.
- Ensure that deficiencies, OFIs, findings, best practices, and recommendations are supported with report content.
- For each identified deficiency and finding, the report will put into perspective the actual or potential consequence (the "so what") of the identified issue.

1.1.d Write a conclusion for each results section as assigned to align with the body of the section.

1.1.e Provide complete inputs to Team Lead or Lead Report Writer.

1.2 Lead Report Writer

NOTE: If no Lead Report Writer is assigned, section 1.2 is performed by the Team Lead.

1.2.a Review input and ensure that content and style meet expectations provided by Team Lead.

1.2.b Ensure that individual section conclusions are supported by section content.

1.2.c Ensure that report conclusions are supported by section conclusions.

1.2.d Provide consolidated inputs to Team Lead.

1.3 Team Lead

1.3.a Review inputs provided by Lead Report Writer.

1.3.b Construct an executive summary that highlights the key aspects of the assessment scope of review and conclusions, in accordance with the EA-30 template maintained on EAShare.

1.3.c Compile initial draft report for review in accordance with current report template.

2. Team Peer Review and Technical Writing Advisor (TWA) (step duration 10 business days; T+15)

NOTE: Team Lead has flexibility on how to engage team members and Technical Writing Advisor to mature draft report and achieve expected level of quality. Reviews will include the attributes outlined in the EA-30 report template and guidance maintained in EAShare.

2.1 Team Members

2.1.a Provide peer reviews of report sections as requested by Team Lead.

2.1.b Address TWA comments on assigned report sections.

2.2 Technical Writing Advisor (TWA)

2.2.a Works with Team Lead, Lead Report Writer, and report section writers to ensure that the report is consistent with the EA-30 report template and guidance maintained in EAShare.

2.2.b Provides comments and recommendations to the Team Lead.

2.3 Team Lead

2.3.a Coordinate with TWA, and team members as needed, to finalize TWA draft of report.

2.3.b If the report documents complex technical issues, or if it is anticipated that conclusions may be questioned by the DOE site/field office during FAR, then consider requesting an independent peer review from an SME (support contractor or Federal staff) who did not participate in the assessment.

2.3.c Once finalized, notify the MRB that the draft of the report is ready for review within TEAMS.

3. Management Review Board (MRB) (step duration 4 business days; T+19)

NOTE: The MRB normally consists of the responsible T-2 office director and another T-2 office director within EA-30. The EA-30 Director and Deputy Director may adjust the membership of the MRB as appropriate to address issues and sensitivities of individual reports.

3.1 Management Review Board Members (includes T-2 office director)

3.1.a Review MRB draft of the report within TEAMS when notified by Team Lead.

3.1.b Provide comments to Team Lead within two days of notification (ref. step 2.3.c).

3.1.c Attend MRB meeting if scheduled.

3.2 T-2 Office Director (in addition to responsibilities as MRB Chair)

3.2.a Review all MRB comments within TEAMS.

3.2.b Notify T-1 Director and Deputy Director if report contains sensitive material that requires additional reviewers to participate in MRB.

3.2.c Schedule MRB meeting if necessary.

3.2.d Determine whether additional revision to the draft report is needed.

NOTE Prior to being released for FAR (the first time it will be visible outside of EA), the draft report must communicate conclusions clearly, present information in an appropriately balanced manner, and objectively address topics that are likely to be contentious or politically sensitive.

3.2.e Authorize Team Lead to proceed with FAR and technical editing of report.

3.3 Team Lead

3.3.a Review all MRB comments.

3.3.b Engage other team members as appropriate to support comment resolution.

3.3.c Participate in MRB meeting if scheduled.

3.3.d Resolve all MRB comments to generate FAR draft of the report.

4. Factual Accuracy Review and Technical Editing Review (step duration 10 business days; T+29)

4.1 Team Lead

NOTE: FAR (4.1.a), technical editing review (4.1.b), and drafting of transmittal memorandum (4.1.c) are typically performed concurrently.

NOTE: If there is a potential for the draft report to contain controlled unclassified information (CUI), a derivative classification review/CUI review is obtained (4.1.a.2).

★ 4.1.a Provide FAR draft of the report with line numbering (an Adobe PDF electronic file) and a comment resolution matrix to the assessed site field element for FAR and derivative classification review within one day of receiving authorization from the T-2 office director. Notify EA-30 Administrative Team in the Report Metrics Form the report was sent for FAR.

4.1.a.1 Request FAR comments be returned within 5 business days. Record the date that the draft report is returned from Columbus tech edit in the Report Metrics Form.

4.1.a.2 Request derivative classification review/CUI review if draft report could contain sensitive information.

4.1.a.3 Notify responsible T-2 office director if FAR comments are going to be delayed to allow escalation to appropriate levels of management.

★ 4.1.a.4 Upon receipt of FAR comments, evaluate comments, engaging team members as necessary. Notify EA-30 Administrative Team in the Report Metrics Form that the report was received.

NOTE: Consider all FAR comments with a focus on changes that improve accuracy.

4.1.a.5 Revise report to address FAR comments as appropriate.

4.1.a.6 Update comment resolution matrix indicating how each comment was addressed.

★ 4.1.b Provide Tech Edit draft of the report (a clean MS Word electronic file) to TWA for transmittal to support service contractor Publications Team. Notify EA-30 Administrative Team in the Report Metrics Form that the report was sent to Tech Edit.

4.1.b.1 Request technical editing review be completed within 5 business days. Record the date that FAR comments are received from site in the Report Metrics Form.

★ 4.1.b.2 Upon receipt of technical editing, review comments (RLSO) and make appropriate changes to Tech Edit draft of the report. Notify EA-30 Administrative Team in the Report Metrics Form that the report was received.

NOTE: Ensure that technical editing comments do not change the meaning or context of the report.

4.1.c Draft report transmittal memorandum and provide to EA-30 Administrative Team.

4.1.d Consolidate technical editing and FAR comments in a single updated draft of the report (T-2 Verification draft).

4.1.e Update draft report with appropriate document markings following derivative classification review, if necessary.

4.1.f Provide T-2 Verification draft within TEAMS of the report with updated FAR comment matrix and draft report transmittal memorandum to the responsible T-2 office director within five days of receiving FAR and technical editing comments.

4.2 Technical Writing Advisor

4.2.a Upon receipt of second draft report, coordinate with support service contractor Publications Team to perform comprehensive technical editing review.

4.2.b Provide completed technical editing review to Team Lead within five days of initial request.

5. T-2 Verification (step duration 2 business days; T+31)

NOTE: The purpose of this verification is to ensure appropriate responses to FAR comments; this should not repeat reviews performed in step 3.

5.1 T-2 Office Director

5.1.a Review FAR comment matrix to verify that consideration was given to the assessed site field element comments, and T-2 Verification draft report contains appropriate updates as indicated.

5.1.a.1 Discuss and resolve potential discrepancies or omissions with Team Lead.

5.1.b Authorize Team Lead to send completed FAR comment matrix back to site field element and offer a discussion.

5.1.c Authorize Team Lead to notify T-1 Deputy Director T-1 Review draft of the report is ready for review.

5.2 Team Lead

5.2.a Notify EA-30 Administrative Team that the draft report is back from FAR and tech edit by entering the date in the Report Tracker Data Form.

5.2.b Resolve FAR resolution concerns with T-2 office director.

5.2.c Update comment resolution matrix with any changes.

5.2.d Send completed FAR comment matrix to site field element and offer a discussion.

NOTE: If a site discussion is requested, T-1 review should not be delayed pending the outcome of the discussion.

5.2.3 Notify T-1 Director and Deputy Director that T-1 Review draft of the report is ready in TEAMS for review.

6. T-1 Review (step duration 2 business days; T+33)

NOTE: The purpose of this review is to ensure that the T-1 Review draft of the report is ready to be submitted to the QRB. The T-1 Director and Deputy Director conduct their review in parallel. The review will continue even if one of them is unavailable.

6.1 T-1 Deputy Director

6.1.a Review T-1 Review draft of the report in TEAMS.

6.1.b Within two days of receiving notification from Team Lead, provide comments, if necessary, in the Teams channel for prompt resolution by the Team Lead.

6.1.c Participate in comment resolution meeting if necessary.

6.1.d If the T-1 Director is unavailable, upon resolution of comments made in step 6.1.b, direct Team Lead to provide report to EA-30 Administrative Team for QRB facilitation at least six days prior to scheduled QRB.

6.2 T-1 Director

6.2.a Review T-1 Review draft of the report in TEAMS.

6.2.b Within two days of receiving notification from Team Lead, provide comments, if necessary, in the Teams channel for prompt resolution by the Team Lead.

6.2.c Participate in comment resolution meeting if necessary.

6.2.d Upon resolution of comments made in steps 6.1.b and 6.2.b, direct Team Lead to provide report to EA-30 Administrative Team for QRB facilitation at least six days prior to scheduled QRB.

NOTE: This action will be completed by T-1 Deputy Director (6.1.d) if T-1 Director is unavailable.

6.3 T-2 Office Director

6.3.a Coordinate with Team Lead to review and resolve T-1 Director's and Deputy Director's comments.

6.3.b Participate in comment resolution meeting with T-1 Director and Deputy Director if necessary.

6.4 Team Lead

6.4.a Review and resolve T-1 Director's and Deputy Director's comments.

6.4.b Schedule comment resolution meeting with T-1 Director and Deputy Director if requested.

6.4.c Upon notification by T-1 Director that T-1 Review draft of the report is ready in TEAMS for QRB, rename the report "(assessment name) QRB draft" and submit the QRB draft report via email to EA-30 Administrative Team for facilitation of QRB meeting per *QRB Business Policy*.

6.5 EA-30 Administrative Team

6.5.a Prepare QRB draft report for QRB facilitation (add line numbers).

6.5.b Submit prepared report to EA-1 Executive Assistant at least six days prior to scheduled QRB.

6.5.c After completing review, provide clean draft of transmittal memorandum to Team Lead prior to scheduled QRB.

7. Quality Review Board (step duration 6 business days; T+39)

NOTE: The QRB process is governed by EA Business Policy, Quality Review Boards. *This section describes EA-30 processes for interfacing with QRB.*

7.1 Team Lead

7.1.a Upon the completion of QRB member review, evaluate comments (in coordination as needed with team members) and develop proposed responses.

NOTE: Per EA QRB Business Policy, QRB members are required to complete review and submit comments two days prior to scheduled QRB meeting.

7.1.a.1 If additional information is needed to fully understand specific comments, contact QRB members in advance of the QRB.

7.1.a.2 Give careful consideration to QRB member comments and accept those comments that improve the content and messaging of the report.

- Comments that would undermine the accuracy or validity of the report should not be accepted.
- When responding to QRB comments, focus should be on the intent of the comment; recommended wording need not be accepted.

7.1.b Notify QRB members when the proposed responses have been completed.

NOTE: If the QRB Chair determines that a meeting is not necessary to address the QRB members' suggested revisions and comments, the QRB chair will request approval from the QRB Advisor in accordance with the QRB Business Policy.

7.1.c During QRB meeting, lead discussion of proposed responses to substantive comments provided by QRB members.

NOTE: There is no need to discuss straight forward or editorial comments. Resolutions to substantive comments should be achieved during the meeting when possible.

7.1.d Update draft report to reflect agreed upon resolutions to QRB comments.

7.1.e If requested by QRB Advisor, provide updated report to QRB for further review.

7.1.f Upon acceptance of the report by the QRB Chair, prepare final draft of report in TEAMS for T-1 final review.

8. T-1 Final Review (step duration 2 business days; T+41)

8.1 Team Lead

8.1.a Compile the report package and all assessment supporting documentation (MS Word versions of final draft report, transmittal memorandum, interviews, documents and observations form; FAR comment resolutions; and outbrief summary/slides).

8.1.b Upload complete report package to DocShare.

8.1.c Notify EA-30 Administrative Team that report package has been uploaded to DocShare and is now ready for EA-1 review and approval. Notification is to include concurrence of T-1 management of report package readiness.

8.2 EA-30 Administrative Team

8.2.a Upon receiving notification from Team Lead, prepare report package for final review and approval by EA-30 management.

8.2.a.1 Verify all documents are present and file names are correct.

8.2.a.2 Review report package to verify completeness and accuracy, including a thorough editorial review of transmittal memorandum and verification of the distribution list.

8.2.a.3 Upon completion of review, create RA attached to report in DocShare.

8.2.a.4 Link (relate) the files of the executive summary and transmittal memorandum to report RA.

8.2.b Process RA approvals of report package.

8.2.b.1 Assign RA approval action to respective T-2 office director for review and concurrence.

8.2.b.2 After RA approval by T-2 office director (8.3.b), ensure RA approval action is assigned to T-1 Deputy Director for review and concurrence.

8.2.b.3 After RA approval by T-1 Deputy Director (8.4.b), ensure RA approval action is assigned to T-1 Director for review and approval.

8.2.b.4 After approval by T-1 Director (8.5.b), assign RA action to EACOM for EA-1 Front Office approval.

8.3 T-2 Office Director

8.3.a Upon being assigned the RA within DocShare, review report package.

8.3.b Provide concurrence with report package by approving RA and providing a comment.

8.3.c Assign the next RA action to the T-1 Deputy Director for concurrence.

8.4 T-1 Deputy Director

8.4.a Upon being assigned the RA within DocShare, review report package.

8.4.b Provide concurrence with report package by approving RA and providing a comment.

8.4.c Assign the next RA action to the T-1 Director for concurrence.

8.5 T-1 Director

8.5.a Upon being assigned the RA within DocShare, review report package.

8.5.b Provide approval of report package by approving RA and providing a comment.

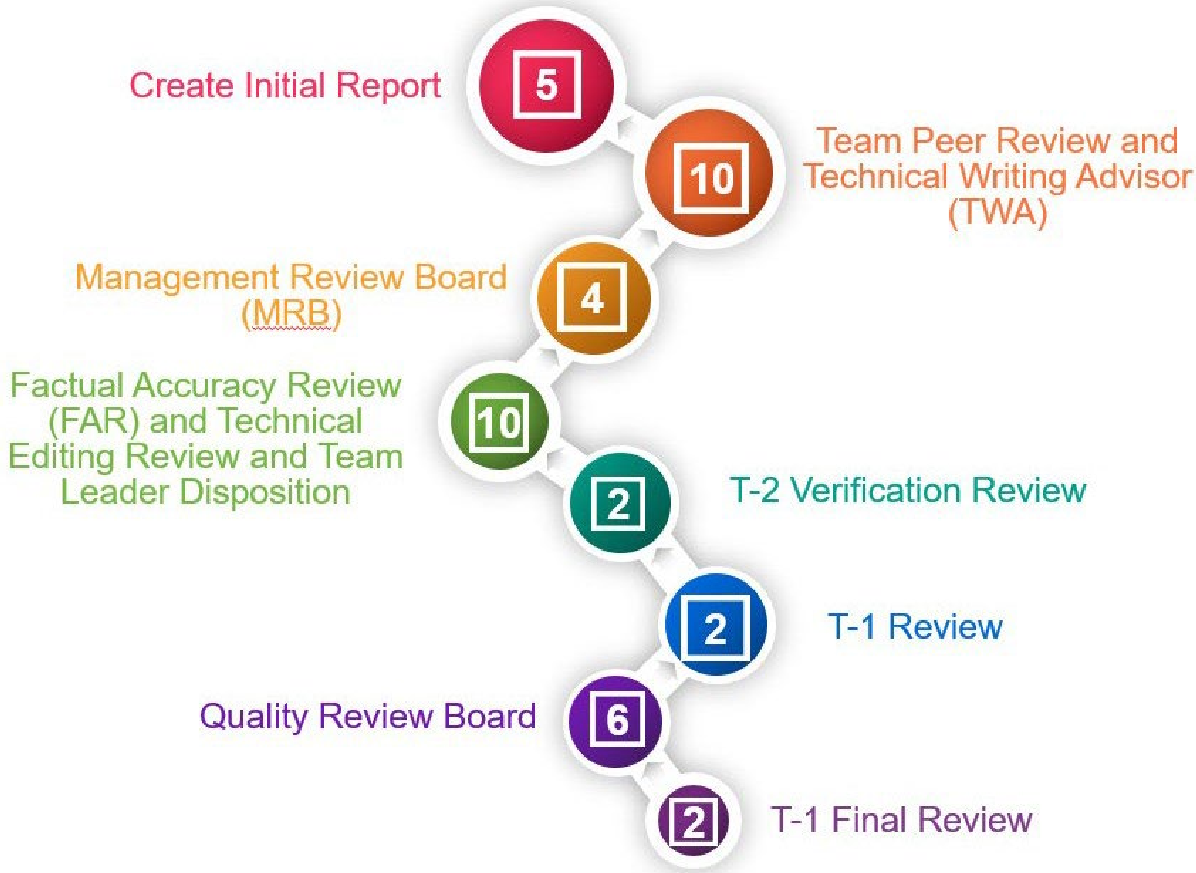
Team Lead Report Flowchart

The flowchart on the following page is a job aid to assist Team Leads in preparing EA-30 assessment reports, the steps of which are based on the detailed procedure steps of this appendix.

Phase	Activities	Dates
Initial Draft (5 Days)	• Review inputs provided by lead report writer • Construct an executive summary in accordance with the EA-30 template maintained on EAShare. • Compile initial draft report for review in accordance with current report template. • Notify EA-30 Admin that initial draft report is ready for TWA review	Target Date: Date Complete:
Peer Review & TWA (10 Days)	• Coordinate with TWA, and team members as needed, to finalize first draft report. • Once finalized, notify MRB and EA-30 Admin first draft report is ready for review.	Target Date: Date Complete:
MRB (4 Days)	• Review all MRB comments. • Engage other team members as appropriate to support comment resolution. • Participate in MRB meeting if scheduled. • Resolve all MRB comments to generate second draft of report. • Notify EA-30 Admin draft report is ready for factual accuracy review and technical editing.	Target Date: Date Complete:
FAR & Tech. Editing (10 Days)	• Provide second draft report with line numbering (Adobe PDF) and a comment resolution matrix to the assessed site field element for FAR within one day of receiving authorization from the T-2 office director. • Provide second draft report (MS Word) to TWA for transmittal to support service contractor Publications Team. • Consolidate technical editorial comments and FAR comments on a single updated draft of the report (third draft). • Provide third draft report with updated FAR comment matrix and draft report transmittal memo to T-2 office director within two days.	Target Date: Date Complete:
T-2 Verification (2 Days)	• Resolve FAR resolution concerns with T-2 office director. • Update comment resolution matrix with any changes. • Send completed FAR comment matrix to site field element and offer a discussion. • Notify T-1 Director and Deputy Director that third draft report is ready for review.	Target Date: Date Complete:
T-1 Review (2 Days)	• Review and resolve T-1 Director's and Deputy Director's comments. • Schedule comment resolution meeting with T-1 Director and Deputy Director if requested. • Upon notification by T-1 Director that third draft report is ready for QRB, submit third draft report via email to EA-30 Admin for facilitation of QRB meeting per QRB Business Policy.	Target Date: Date Complete:
QRB (6 Days)	• Upon the completion of QRB member review, evaluate comments (in coordination as needed with team members) and develop proposed responses. • Notify QRB members when the proposed responses have been completed. • During QRB meeting, lead discussion of proposed responses to substantive comments provided by QRB members. • Update draft report to reflect agreed upon resolutions to QRB comments. • If requested by QRB Advisor, provide updated report to QRB for further review. • Upon acceptance of the report by the QRB Chair, prepare final draft of report for T-1 final review.	Target Date: Date Complete:
T-1 Final Review (2 Days)	• Compile the report package (MS Word versions of final draft report, executive summary, and transmittal memo) and all assessment supporting documentation (interviews, documents and observations form, FAR comment resolutions, and outbrief summary/slides). • Upload complete report package into DocShare, request EA-30 Admin support if needed. • Notify EA-30 Admin that report package is now ready for final review and approval	Target Date: Date Complete:

Report Writing Timeline

The numbers of business days budgeted for each step are shown below. The timeframe for each step is a goal, not a requirement, but best efforts should be made to accomplish each step within the budgeted time. Meeting the business-day timeline for each step will result in an assessment report being submitted to EA-1 for review within 60 calendar days of completion of data collection.



In total, 41 business days are budgeted for report development to support submission to EA-1 within 60 calendar days. Flexibility is available to account for some reviews taking longer than anticipated.

Not accounting for holidays,

if T=0 is on a…	T+41 is calendar day number…
Monday	51
Tuesday	51
Wednesday	51
Thursday	53
Friday	53

APPENDIX C
Types of 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 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 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 DOE 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 D
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 Lead 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

T-1 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 Lead 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.

T-2 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 Assessments (EA-34)

- 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 Leads on the formulation of assessment teams
- Work with line management from other sites/organizations to encourage and enable augmentee involvement in assessment activities.

Team Lead

- 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
- Provides necessary information to the EA-30 Administrative Team to allow the augmentee to be added to appropriate accounts and accesses
- Provides guidance and direction to the augmentee, including providing the *EA-30 Assessment Augmentee Training Guide*, and working through its action items with the augmentee

- Communicates any challenges with augmentee involvement in assessment activities to the cognizant EA-30 T-2 office director
- Provides feedback and lessons learned to EA management on augmentee involvement in the assessment activity.

APPENDIX E
Records Management

1.0 INTRODUCTION

This appendix defines EA-30 oversight activity and assessment-related records and contains expectations for their management, retention, and disposition consistent with DOE Order 243.1C, *Records Management Program*, and EA's *Independent Oversight Program Appraisal Process Protocol*. A wide variety of records are generated and collected during the process of planning for and conducting an EA-30 assessment or oversight activity. All assessment and oversight activity records will be managed in an electronic format. It is important for EA Federal and support personnel to carefully manage records to ensure that they are retained and dispositioned pursuant to the applicable Records Disposition Schedule.

2.0 RECORDS GENERATED BY EA-30 ASSESSMENTS

Final assessment reports provide the formal record of the results of the EA-30 Independent Oversight Program activities. While EA-30's goal is to include sufficient detail in each report to fully justify its conclusions and enable the report to stand on its own, there is a need to retain some documentation that provides additional information about various aspects of an assessment. Consequently, it is EA-30's policy to create and maintain case files of assessment information. The minimum contents of assessment case files are listed below:

- Assessment plan
- Listing of key documents reviewed, interviews, and observations during the assessment
- Site and/or program office factual accuracy review comments
- Briefing materials on the assessment results
- Management responses to the appraisal (if provided)
- Final report (including field notes) and report transmittal memorandum.

Additional information may be retained in the assessment case file as necessary to address any unique aspects of an assessment.

EA-30 staff and support personnel generate and review other information not contained within the office's formal case file. This includes team communications, site- or program office-generated documents, and draft report input and draft assessment reports for internal review. These kinds of records are categorized as "intermediary" records.

3.0 FIELD NOTES

This protocol also discusses studies, analyses, topical area evaluations, and operational awareness activities that may be documented in field notes. Field notes provide the record of these other types of oversight activities. Additional records generated or reviewed during the oversight activity are categorized as "intermediary" records.

4.0 RECORDS RETENTION REQUIREMENTS

The following are the associated Records Disposition Schedules for EA-30 assessment records.

Records Type	Records Disposition Schedule	Guidance
Final Assessment Report or Field Note Reports or Field Notes on activities that attract national media attention, attract Congressional attention, result in substantive changes in Departmental policy or procedure, or are cited in semi-annual reports to Congress.	Administrative Records Schedule 22, item 1.a.1	**Permanent Record** - Cut off annually - Transfer to the National Archives and Records Administration (NARA) when 10 years old in 5-year blocks
Assessment Case Files Case files developed in connection with activities that attract national media attention, attract Congressional attention, result in substantive changes in Departmental policy or procedure, or are cited in semi-annual reports to Congress.	Administrative Records Schedule 22, item 2.a	**Permanent Record** - Cut off upon completion of assessment - Transfer to NARA with associated report
Intermediary Records Non-substantive working files: collected and created materials not coordinated or disseminated outside the unit of origin that do not contain information documenting significant policy development, action, or decision making.	General Records Schedule 5.2, item 20	**Temporary** Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later. EA-30 has established a policy that intermediary records will be destroyed 2 years after the issuance of the final assessment report.

5.0 REQUIREMENTS

Federal Staff and Support Personnel

- Manage assessment records in an electronic format.

EA-30 Administrative Staff

- Upon issuance of a final assessment report, confirm that the records comprising the case file have been properly transferred to DocShare.
- Coordinate with the applicable EA-30 office director to prepare electronic records for transfer to NARA consistent with the Records Disposition Schedules shown above.

- Coordinate with the applicable EA-30 office director to destroy (delete) intermediary records from the established network file folder per the Records Disposition Schedules shown above.

Assessment Team Leads

- Consult with the EA Classification Representative if an assessment might involve classified subjects.
- Coordinate with the EA Communications Center for support in managing any classified records.
- Establish a network file folder for each assigned assessment to serve as a common location to manage assessment records.
- Determine whether additional records need to be included in the assessment case file due to unique attributes associated with the assessment.
- Once finalized, ensure that all records that comprise the assessment case file are placed in EA's information repository (DocShare).

T-2 Office Directors

- Review EA assessment records annually and identify records due to be transferred to NARA or for destruction, consistent with the established Records Disposition Schedules shown above. Coordinate with EA-30 Administrative Staff for record transfers and destruction.