



Department of Energy

Washington, DC 20585

November 8, 1995

Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Washington, DC 20004

Dear Mr. Chairman:

Enclosed is the Office of Environment, Safety and Health's Office of Oversight Training Team Assessment Plan and Report for the EH Residents at the Oak Ridge Site. These deliverables are in response to DNFSB Recommendation 94-4 Implementation Plan Task 5 (commitments 5.1 and 5.2), Technical Competence of the Key Federal Personnel at the U.S. Department of Energy Oak Ridge Site.

The submission of these deliverables by the Office of Environment, Safety and Health constitutes a slight modification to Task 5, as discussed with Board staff, by separating the Training Assistance Team assessments conducted by line management from those conducted by independent oversight. The remaining deliverables required under Task 5 for key Federal Oversight Personnel will be completed in accordance with the schedules in the Implementation Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara O'Toole".

Tara O'Toole, M.D., M.P.H.
Assistant Secretary
Environment, Safety and Health

2 Enclosures

cc w/enclosures:
Mark B. Whitaker, EH-9

EH OFFICE OF OVERSIGHT
TRAINING TEAM ASSESSMENT REPORT
FOR THE
EH RESIDENTS
AT THE
U.S. DEPARTMENT OF ENERGY
OAK RIDGE SITE
(Y-12)

October 1995

INTRODUCTION

On August 21 - 24, 1995, the EH Office of Oversight Training Team conducted a review of the qualifications and training status of the EH Residents at Oak Ridge. The purpose of this review was to ensure the Residents possess the proper training, experience, technical competence and management support to satisfactorily perform their oversight tasks at Y-12 and at other facilities at Oak Ridge.

The Oversight Training Team conducted this review using the performance objectives and criteria defined in the *EH Office of Oversight Training Team Assessment Plan for the EH Residents at Oak Ridge*, dated August 1995. The review consisted of record reviews and personnel interviews at DOE Headquarters and the EH Resident Office at Oak Ridge.

BACKGROUND

On September 27, 1994, the Defense Nuclear Facilities Safety Board (DNFSB) issued Recommendation 94-4 which involved criticality safety deficiencies observed at the U.S. Department of Energy Oak Ridge Y-12 Plant. The Recommendation stated that reviews of adherence with nuclear criticality safety limits at Y-12 identified widespread levels of noncompliance. The Recommendation also identified weaknesses in the criticality safety program relative to procedures, conduct of operations, and Department and contractor personnel experience, training, qualifications and performance.

In response to the DNFSB Recommendation, the Department issued an Implementation Plan to address and correct the deficiencies identified in Recommendation 94-4. Task 5 of the plan requires a review of the qualifications, training, and technical competence of DOE personnel with responsibility for management or oversight of criticality safety programs at the Y-12 Plant. A Defense Programs Training Assistance Team performed an assessment of the training and qualifications of key DOE personnel (excluding the EH Residents) at Y-12 on August 14 -18, 1995. In keeping with the EH Office of Oversight's role as the DOE independent oversight authority, a separate review of the training and qualifications of the EH Residents at Oak Ridge was conducted by the Office of Oversight Training Team the week of August 21, 1995.

This report provides the deliverables for Recommendation 94-4, Task 5 for the portion related to the EH Office of Oversight and the EH Residents at Oak Ridge.

ASSESSMENT OF THE EH OFFICE OF OVERSIGHT AND THE EH RESIDENTS AT OAK RIDGE

I. ORGANIZATION AND INFRASTRUCTURE

The current Office of EH Residents (EH-24) was established on December 18, 1995, as a result of the EH reorganization. Prior to the reorganization, EH maintained two separate site representative organizations (EH-14 and EH-30.3)

in the field. These organizations were responsible for nuclear and non-nuclear safety oversight, respectively.

The December 1995 EH reorganization combined these two organizations into the current EH Resident organization within the Office of Oversight. Formal policies and procedures have been developed to control the scheduling, conduct, and reporting of oversight activities. The combination of the two representative programs has resulted in consistency of nuclear and non-nuclear safety oversight and transitioned the EH site presence to a single point of contact. Timeliness in the reporting of the results of EH Resident oversight activities to line management has also significantly improved since the reorganization.

The EH Residents organization is clearly defined in the EH Office of Oversight Management Plan, dated April 1995. A staffing level of six has been established in the plan for the Oak Ridge Office; currently all six positions are filled. Four of the six EH Residents at Oak Ridge were associated with the former EH-14 and EH-30.3 representative programs; two additional personnel were brought in to support the EH-24 mission.

Routine oversight activities at Y-12 were recently limited by the assignment of collateral work duties and special projects for the two EH Residents performing most of the surveillances at Y-12. One of the EH Residents was providing considerable support to the EH Office of ES&H Evaluations for the last 8 months. The other EH Resident assigned to Y-12 supported numerous initiatives and special projects assigned by EH-24 management that detracted him from his routine oversight activities at Y-12.

During followup discussion on September 15, 1995, the EH-24 Office Director indicated the EH Resident supporting the Office of ES&H Evaluations would be resuming his full-time support of surveillance activities in the near future. The Director also indicated that, although EH-24 management discretion is needed to support special initiatives and projects within the Office of Oversight, no such projects or special assignments were envisioned in the near future for the Oak Ridge EH Residents.

Review of Office of Oversight management plans and interviews with personnel identified that Office of Oversight management and the EH Residents recognize the need for and support technical training. Documentation reviews identified that appropriate qualification requirements were contained in EH Resident position descriptions and recent vacancy announcements.

Concurrent with the reorganization of the EH Resident program, the need for a Resident training and qualification program was recognized. Although a formal Office of Oversight Training and Qualification program was under development as part of the Department's response to DNFSB 93-3, an Interim EH Resident Qualification Program was proactively established for new EH Residents reporting to duty prior to the implementation of the formal EH Office of Oversight technical qualification program. The interim qualification program

is based on a qualification card (specific to the Resident technical specialties of Nuclear Safety, Radiation Protection, Occupational Safety, Industrial Hygiene, and Environmental Safety) which identifies required reading and formal training.

Although the development of the interim qualification cards was a group effort involving the entire EH Residents staff, the qualification cards were never formally issued by the Director of the Office of EH Residents nor incorporated into EH Resident procedures. At the time, it was thought development of a formal Office of Oversight qualification program would be immediately forthcoming. Responsibility for implementation of the interim qualification cards is at the Regional Manager level.

Two new EH Residents at Oak Ridge completed interim qualification cards and were subsequently determined to be qualified to conduct oversight surveillances by the cognizant Regional Manager. Although the interim program appears to be appropriately implemented, the lack of a formal policy or procedure related to the interim program was noted. Interview of the Residents identified confusion existed during the qualification process as to priorities and timeframes related to qualification. Review of a completed interim qualification card identified that several items (training courses, document reviews) had not been signed off. Significance of the items was not such that they would impact Resident performance; however, the qualification memorandum issued by the Regional Manager did not identify the open items as still requiring completion.

Since the completion of this review, the Office of Oversight has issued formal policy and procedures related to the implementation of the Office of Oversight Training and Qualification Program. Specific details are provided in Section IV of this report. Successful implementation of the formal program will resolve the implementation concerns with the Interim Qualification Program noted above.

It was noted during the review that current EH Resident staffing does not include an Environmental Specialist. The scope of the existing EH Resident oversight program, as characterized in the Office of Oversight Management Plan and the EH Resident Performance Guides, includes responsibility for overseeing environmental protection.

During followup discussion on September 15, 1995, the EH-24 Office Director indicated that current hiring restrictions prevent the hiring of additional EH Residents with environmental expertise. The Director indicated, however, that environmental protection is included as a topic area in the Comprehensive ES&H Evaluations currently being conducted by the Office of Oversight. The EH-24 Director also indicated that the Office of ES&H Evaluations contains personnel with environmental expertise who can act as subject matter resources for EH-24. It is recognized by the EH-24 Director that the Oak Ridge EH Residents need basic environmental skills in order to identify potential problems and to enhance their ability to work with environmental matters.

The current process for procuring site access training for the EH Residents at Oak Ridge was found to be cumbersome and time-consuming. Unlike several other EH Resident office locations, site access training costs for the Oak Ridge EH Residents are not paid for by the DOE Oak Ridge Office. Consequently, the Oak Ridge EH Residents must specifically apply for and obtain approved training requests (and supporting funding) from Headquarters for each site access training class they attend.

Discussion with Office of Oversight management identified the capability currently does not exist to establish funding centers at Oak Ridge for site access training. Development of a formal tracking system for site access training and qualifications (as discussed in Section II) will provide for earlier advance notice and improved scheduling of site access training; this may alleviate some of the impacts of the current approval process. In general, the Oak Ridge EH Residents have completed their required access training.

II. STAFF COMPETENCY

It was found that the two EH Residents assigned to Y-12 have extensive nuclear technology experience and had identified Conduct of Operations problems at Y-12 prior to the Defense Board's Recommendation 94-4. Both EH Residents had successfully completed nuclear qualifications in the U. S. Navy Nuclear Power Program. In addition, while assigned to the Office of Nuclear Safety, one EH Resident completed radiological protection site representative qualifications and the other EH Resident completed nuclear safety site representative qualifications. Both EH Residents assigned to Y-12 were knowledgeable of nuclear criticality safety requirements, however, additional training in criticality safety is advisable to enhance technical skills and improve knowledge of advances in nuclear criticality safety.

Evaluation of the technical competency of the Oak Ridge EH Residents was based on review of the Resident's SF 171s, training records and resumes, interviews with three Oak Ridge EH Residents, and observation of two EH Resident surveillances. Based on this review, the Oversight Training Team is satisfied the Oak Ridge EH Residents are technically competent and fully qualified to perform their oversight duties. Interviews identified that several of the Oak Ridge Residents have taken the initiative to actively pursue professional certification in their areas of expertise.

It was noted that no formal system was in place to track the status of EH Residents site access training and/or qualification. One EH Resident's respirator qualification had unknowingly expired.

The Acting Senior EH Resident and Acting EH Regional Manager had previously identified this weakness and efforts were underway at both the Office and Regional level to develop a training database for the EH Residents which would track EH Resident training status and notification of the need for access training prior to expiration. The Acting Senior EH Resident indicated the tracking system would be in place by the end of CY 95.

The Individual Development Plans (IDPs) of the EH Residents were reviewed. IDPs varied in quality and level of detail, and had not been updated to reflect consistency with the Interim Qualification process. Many of the IDPs were deliberately general in nature; this was based on staff perception that EH-24 management would only support and approve training referenced in the IDP.

Since the completion of this review, the Office of Oversight has issued formal policy and procedures related to the implementation of the Office of Oversight Training and Qualification Program. Specific details are provided in Section IV of this report. Successful implementation of the formal program should resolve IDP concerns noted above.

III. PERFORMANCE OF OVERSIGHT

The Oversight Training Team observed the performance of two surveillances by Oak Ridge EH Residents. Both surveillances were properly conducted in accordance with the EH Resident surveillance procedures. EH Resident interaction with the contractor and DOE line management was satisfactory.

A deficiency related to closure of an issue form was identified. An EH Resident Issue Form (ORO-WATERPLT-95-001), transmitted to the Oak Ridge Operations Office (OR) in April 1995, was noted to be overdue without receipt of an acceptable response. DOE OR responded to the Issue Form within 30 days; however, the response was limited to technical comments rather than accepting/rejecting the issue, outlining corrective actions, etc. The EH Residents informally followed up the open issue with DOE OR management through discussions; however, no formal followup memorandum has been sent and the issue remains open. The current Acting Senior EH Resident has subsequently met with DOE OR management to resolve the open Issue. The issue is scheduled to be closed by November 10, 1995.

Review of the applicable EH Resident procedure controlling surveillance reporting identified the procedure does not address appropriate followup to overdue line management response to EH Resident Issues. This was identified during an EH-24 meeting on April 26-27, 1995, and appropriate followup methods (phone call followed by formal memorandum) were discussed; however, revisions to the procedure have not been issued by EH-24.

Specific assignments and timeframes for revising the surveillance reporting procedure were assigned during the EH Residents' quarterly meeting, held on October 11-13, 1995.

IV. TRAINING AND ADMINISTRATION STAFF AND PROGRAMS

Training and training administration support for the Office of EH Residents is provided by the Office of Oversight Analysis and Planning Support (EH-23) within the Office of Oversight. EH-23 has responsibility for developing policy, procedures, and providing support for implementation of the Office of Oversight Training and Qualification program developed as part of the Department's efforts to respond to DNFSB 93-3.

The EH Office of Oversight has been aggressively pursuing implementation of DNFSB 93-3. During the time period of this review, procedures for implementing the Technical Qualification program were in draft form. The formal policy and program implementation procedure for the Training and Qualification program were subsequently approved September 7, 1995. The Office of Oversight has also completed identification of program participants, their assigned functional areas, and Office facility specific standards. Within the next 4 months, the following activities are scheduled for completion:

Determine each EH Resident's specific Technical Qualification Program competencies requiring learning activities (Individual Needs Assessment).

Implementation of Office of Oversight Individual Development Plan procedures and completion of an Individual Development Plan for each EH Resident.

Interview of the Oak Ridge EH Residents indicated they were familiar with Recommendation 93-3 and the general aspects of the forthcoming Technical Qualification program. There was some apprehension, however, concerning the logistics of implementation and the time requirements associated with program implementation.

The transmission of significant events and lessons-learned between the various EH Resident offices was reviewed. The EH Residents currently hold a weekly conference call which provides the primary method to share experiences and lessons-learned between the different sites. Although generally effective, it was felt this mechanism relies heavily on the discretion of the individual Residents to raise issues, and also provides limited time for questions and answers. Consequently, for more complex issues or lessons-learned, the conference call does not provide an optimal format.

During followup discussion on September 15, 1995, the EH-24 Office Director indicated the addition of specific lessons-learned training sessions as part of the routinely scheduled EH Resident counterpart meetings would be evaluated.

Implementation of the Office of Oversight Technical Qualification Program and other related training and qualification procedures and guidance is anticipated to resolve a number of the items, as discussed in the body of the report. Since this program was only recently approved, its implementation could not be fully evaluated as part of this review. It is recommended that EH-24 conduct a followup review within approximately 6 months. As required by the *EH Office of Oversight Training Team Assessment Plan for the EH Residents at Oak Ridge*, a corrective action plan with milestones which will address open items will be developed in accordance with Recommendation 94-4.

PERSONNEL INTERVIEW LIST

| | |
|---------------|---|
| Bob Spence | YSO Manager |
| John Rothrock | Safety and Health Division Director |
| Dan Hoag | YSO Environment, Safety, and Health Branch Chief |
| Oliver Lynch | Director, Office of ES&H Residents, Office of Oversight |
| Dave Rohrer | Acting Eastern EH Residents Regional Manager |
| Dan DeFord | EH Resident at Oak Ridge |
| Bill Cooper | Senior EH Resident at Oak Ridge |
| Joe Carson | EH Resident at Oak Ridge |
| Skip Singer | EH Resident at Oak Ridge |

EH OFFICE OF OVERSIGHT
TRAINING TEAM ASSESSMENT PLAN
FOR THE
EH RESIDENTS
AT THE
U.S. DEPARTMENT OF ENERGY
OAK RIDGE SITE

August 1995

1.0 INTRODUCTION

On September 27, 1994, the Defense Nuclear Facilities Safety Board (DNFSB) issued Recommendation 94-4 which involved criticality safety deficiencies observed at the U.S. Department of Energy Oak Ridge Y-12 plant. The Recommendation describes a September 22, 1994, event in which members of the DNFSB staff noted discrepancies between the criticality safety approval requirements and the configuration of storage arrays while observing the unloading and storage of a weapon component. In responding to this identified violation of nuclear criticality safety limits, the Department and contractor personnel failed to take appropriate corrective actions in accordance with site procedures. Following the event, the operating contractor, Martin Marietta Energy Systems, initially curtailed all nuclear operations at the Y-12 Plant.

DNFSB Recommendation 94-4 stated that reviews of adherence with nuclear criticality safety limits at the Y-12 Plant revealed a widespread level of noncompliance. The Recommendation also identified weaknesses in the criticality safety program relative to procedures, conduct of operations, and Department and contractor personnel experience, training, qualifications and performance. In response to the DNFSB Recommendation, the Department established a Senior Steering Committee and a Senior Working Group to oversee development of an overall strategy. In February 1995, Defense Programs (DP) issued the Department of Energy Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 94-4, Deficiencies in Criticality Safety at the Oak Ridge Y-12 Plant. The Implementation Plan describes plans and schedules for the phased resumption of activities at the Y-12 Plant. The following tasks were identified as part of the Implementation Plan:

- Task 1 - Organization
- Task 2 - Criticality Safety Approval/Operational Safety Requirements
- Task 3 - Criticality Safety
- Task 4 - Conduct of Operations
- Task 5 - Technical Competence
- Task 6 - Corrective Actions
- Task 7 - Reporting Requirements
- Task 8 - Change Control

Task 5, Technical Competence, requires the development of a Training Assistance Team Program for Key Federal Personnel at the U.S. Department of Energy Oak Ridge Y-12 Plant. This assessment plan meets part of the deliverable required in Task 5 (commitment 5.1) of the 94-4 Plan. This assessment plan addresses the long-term programmatic improvements associated with technical competence of the EH Residents at the Oak Ridge Site. This assessment parallels the Training Assistance Team visit which focuses on the Federal employees (except the EH Residents) at the Oak Ridge Y-12 Plant. The EH Office of Oversight Training Team Assessment Plan, together with the Training Assistance Team Program Plan, will meet the deliverables required in Task 5 (Commitment 5.1) of the 94-4 Plan.

2.0 PURPOSE

The purpose of this Assessment Plan is to provide the approach and guidelines for the Office of Oversight Training Team evaluation of the EH Residents at the Oak Ridge Site.

The assessment and subsequent observations and recommendations will ensure that the EH Residents at Oak Ridge possess the proper training and experience and can perform their required tasks in a formal, deliberate fashion in accordance with reviewed and approved procedures. The EH Residents and their associated training and qualification programs will be supplemented, as appropriate, based upon the results of this review.

This Assessment Plan provides input to the requirements and commitments delineated in Section 5, Technical Competence Review of the Department's Implementation Plan for DNFSB Recommendation 94-4. Section 5 of the 94-4 Plan has six specific commitments. Commitment 5.1 requires the development of a program to evaluate Key Federal Personnel involved with safety-related activities at defense nuclear facilities at the Y-12 Plant (June 1995). This assessment plan governs the evaluation of the EH Residents at Oak Ridge. The Training Assistance Team Program addresses the rest of the Key Federal Personnel involved at the Y-12 Plant. Commitment 5.2 requires the Training Assistance Team to conduct an assessment using the performance objectives and criteria established in the Training Assistance Team Program. The performance objectives and criteria used in this Assessment Plan will be directly based on the Training Assistance Team Program performance objectives and criteria, as modified to reflect the organization roles and duties of the EH Resident Program. The Oversight Training Team will visit Oak Ridge during the week of August 21, 1995. The Oversight Team Report is due by October 1995. A response to the Oversight Team Report (corrective action plan) is due by December 1995.

3.0 OBJECTIVE AND SCOPE

The Oversight Training Team is tasked to perform an independent assessment of the EH Residents at Oak Ridge. The objectives of the Oversight Training Team Assessment plan are to:

- (1) ensure that the EH Office of Oversight's long-term programmatic functions, which ensure the technical competence of EH Residents, are acceptable;
- (2) that the EH Residents possess the proper training and experience to perform their required tasks;
- (3) meet the Plan deliverables specified in Commitment 5.1 of the 94-4 Plan for the EH Residents at Oak Ridge; and
- (4) establish a satisfactory roadmap for conducting an assessment of the EH Residents at Oak Ridge.

4.0 OVERSIGHT TEAM COMPOSITION

The Office of Oversight Training Team will be led by Tony Weadock, DOE Senior EH Resident at Rocky Flats, and will be composed of two other team members selected on the basis of background and expertise necessary to perform the evaluation. The following personnel have been identified as team members:

Steve Petersen, DOE, EH-23, Office of Oversight, Planning and Analysis
William Miller, DOE, EH-24, Office of Oversight, EH Residents

The Office of Oversight Training Team members were selected in order to maintain independence from the EH Residents at Oak Ridge. This independence was provided because the Team members do not have any supervisory responsibility for the EH Residents at Oak Ridge.

5.0 ROLES AND RESPONSIBILITIES

The responsibilities for the Office of Oversight Training Team are as follows:

A. Oversight Team Leader

1. Serves as the project manager for all Oversight Training Team activities and acts as the primary point-of-contact.
2. Develops the Oversight Training Team Assessment Plan and the Oversight Training Team Assessment Final Report.
3. Coordinates the activities of the Oversight Training Team members and ensures that the assessment activities are performed in a competent and professional manner.

B. Oversight Team Members

1. Perform assessment activities assigned by the Oversight Team Leader in a confidential, competent and professional manner.
2. Provide input to the Oversight Team Leader for the writing of the Oversight Training Team Final Report as requested.

6.0 DELIVERABLES

Oversight Training Team members will prepare a report after the conclusion of the assessment. The report will summarize the results of the visit and identify any observations, open concerns, and noteworthy practices.

7.0 REFERENCES

The following reading list has been developed to assist the Oversight Training Team members in preparation for the assessment.

DNFSB Recommendation 94-4, Deficiencies in Criticality Safety at Oak Ridge Y-12 Plant

Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 94-4, Deficiencies in Criticality Safety at Oak Ridge Y-12 Plant, February 1995

Type C Investigation of the Y-12 Plant Criticality Safety Approval Infractions Event at Building 9204-2E

Y/DD-623, Plan for Continuing and Resuming Operations, October 1994

DOE Order 360.1, Training

Department's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 93-3; Improving the Technical Capability in Defense Nuclear Facilities Programs

Defense Nuclear Facilities Safety Board Recommendation 93-1, Critical Safety Elements, dated February 1994

Technical Qualification Standards

Professional Development of Federal Technical Personnel

APPENDIX A

PERFORMANCE OBJECTIVES AND CRITERIA

PERFORMANCE OBJECTIVE

Overall Program Objective:

EH Residents at Oak Ridge possess the proper training, education and experience to perform their required tasks, including oversight of DOE line management and contractor operations, in a formal, deliberate fashion in accordance with reviewed and approved procedures.

PERFORMANCE OBJECTIVE 1:

The EH Office of Oversight infrastructure is clearly identified including requisite background, education, training, and experience for the EH Residents at Oak Ridge. The organization is structured to efficiently and effectively perform the required oversight functions.

Review Criteria:

The EH Office of Oversight infrastructure can be demonstrated via auditable records and organizational charts. Adequate education, training, and experience requirements consistent with Department and industry standards (equivalent positions in DOE 5480.20A, Recommended Background sections of appropriate Technical Qualification Standards, ANSI Standards, etc.) can be demonstrated for EH Residents at Oak Ridge via auditable Position Descriptions and approved procedures.

Approach:

- Review the EH Office of Oversight organization and staffing requirements for the EH Residents at Oak Ridge.
- Review the EH Residents procedures and policies regarding interface and oversight roles and responsibilities.
- Review the EH Residents Position Descriptions.
- Review the required Knowledge, Skills and Abilities (KSAs) in performance standards.
- Review the Selection Criteria for the EH Residents.
- Determine if the EH Office of Oversight and the EH Residents at Oak Ridge support technical training.
- Review completion of Individual Development Plans (IDPs) and status of required training in IDPs.

PERFORMANCE OBJECTIVE 2:

The Oak Ridge EH Resident positions are staffed with personnel possessing adequate background education, training, and experience to perform required tasks following receipt of specific training for the position.

Review Criteria:

Verify the EH Residents at Oak Ridge possess adequate education, training, and experience requirements consistent with Department and industry standards (equivalent positions in DOE 5480.20A, Recommended Background sections of appropriate Technical Qualification Standards, ANSI Standards, etc.).

Approach:

- Review the EH Residents IDPs (or equivalent) and SF-171 forms.
- Review Training, Qualification, and Experience records of the EH Residents (use appropriate Technical Qualification Standards "as guidance" for anticipated knowledge, skills and abilities).
- Interview a cross cut of the EH Residents.
- Review Training Plans and Resource Allocations.
- Review knowledge of Y-12 Plant Criticality Safety Approval Infractions Event at Building 9204-2E.
- Review technical knowledge of the EH Residents (as appropriate to specific positions).

PERFORMANCE OBJECTIVE 3:

The EH Residents at Oak Ridge can perform oversight of the contractor and DOE line management in a formal, deliberate fashion in accordance with reviewed and approved procedures.

Review Criteria:

The EH Residents at Oak Ridge oversight activities can be demonstrated via auditable records and reports, and are effectively demonstrated in the field in accordance with EH Residents procedures. The responsiveness of DOE line management to EH Residents surveillances can be demonstrated via auditable responses and closure documentation.

Approach:

- Observe the EH Residents performing oversight tasks.

- Observe the EH Residents interactions with DOE line management and the contractors.
- Interview the EH Residents.
- Review documentation of oversight activities of the EH Residents.
- Review identification, communication, and tracking of deficiencies.
- Review DOE line management's responsiveness to EH Residents surveillances.

PERFORMANCE OBJECTIVE 4:

The training organization and administration of the EH Office of Oversight should ensure effective implementation and control of training activities necessary to enable the EH Residents at Oak Ridge to perform their required tasks in a formal, deliberate fashion in accordance with reviewed and approved procedures and policies.

Review Criteria:

The required training for EH Residents at Oak Ridge can be demonstrated via auditable records, review of IDPs, and personnel interactions. The EH Office of Oversight training organization and administration should demonstrate effective implementation and control of training and qualification activities. Training programs for the EH Residents at Oak Ridge are adequate to broaden the knowledge of required tasks and provide position specific training.

Approach:

- Review the EH Office of Oversight training program to ensure a system is defined and implemented for accomplishing the following:
 - Identifying and documenting tasks to be included in training;
 - Conducting on the job training;
 - Administering and controlling examinations to minimize the possibility of compromise;
 - Exempting personnel from training requirements;
 - Providing remedial training;
 - Involvement with changes to EH Office of Oversight and EH Resident procedures; Maintaining current training information on lessons learned from local and industry operating experience (such as Y-12 Plant Criticality Safety Approval infractions Event).

- Review training programs to verify they are systematically improved to ensure the EH Residents at Oak Ridge maintain the required skills and knowledge. Ensure use of feedback from job performance. (Use of self-assessment process.)
- Review use of alternative training methods by the EH Residents at Oak Ridge (self study, computer aided, etc.).
- Review how the EH Residents at Oak Ridge maintain proficiency in accordance with specific program requirements.
- Review the EH Office of Oversight organization structure.
- Review EH Office of Oversight Training Plans and Resource/Manpower Allocations.
- Observe, review and interview a cross-cut of EH Residents at Oak Ridge.

Review oversight role of the EH Residents at Oak Ridge

- Review knowledge of Y-12 Plant Criticality Safety Approval Infractions Event at Building 9204-2E for the EH Residents at Oak Ridge.
- Review knowledge of criticality (as appropriate) for the EH Residents at Oak Ridge.
- Review the process and status of 93-3 Plan implementation requirements for the EH Residents at Oak Ridge.