



Department of Energy
Washington, DC 20585

March 17, 2000

MEMORANDUM FOR DISTRIBUTION

FROM: *Ted Wyka*
Ted Wyka
Director, Safety Management Implementation Team

SUBJECT: Corrective Action Plans for Identified Self-Assessments

The attached guidelines are provided for developing Corrective Action Plans (CAPs) for self-assessments of potential vulnerabilities in the nuclear criticality safety (ref A.) and High-Efficiency Particulate Air (HEPA) programs (ref B). The Safety Management Implementation Team was directed to develop these guidelines in the Deputy Secretary's memo of March 1, 2000 (ref C.).

Attachment 1 outlines the Department's Safety Issue Corrective Action Process, tailored for use with these two self-assessment efforts. This document does not contain new requirements; it merely provides a methodology to carry out secretarial direction regarding development of CAPs and corrective action tracking in the DOE CATS. If you have questions regarding this guidance, please contact Joe Hassenfeldt, co-Chair of the Integrated Corrective Action Management Team (I-CAM), at 202 586-1643.

Attachment

Refs.

- A. Deputy Secretary Glauthier's memorandum to Heads of Departmental Elements, dated 11/3/99, re: Nuclear Criticality Self-Improvement Initiative.
- B. Secretary Richardson's letter to Chairman Conway, dated 12/6/99, re: HEPA Filters Used in the Department of Energy's Hazardous Facilities.
- C. Deputy Secretary Glauthier's memorandum to Distribution, dated 3/1/00, re: Action: Assess Potential Vulnerability Due to Degraded High-Efficiency Particulate Air (HEPA) Filters in Nuclear Facilities.

Distribution:

T. Gioconda, NNSA/DP
C. Huntoon, EM-1
W. Magwood, NE-1
J. Decker, SC-1
R. Glass, AL
R. San Martin, CH
B. Cook, ID
K. Carlson, NV
J. Turner, OAK
S. Brechbill, OH
L. Dever, OR
R. French, ORP
P. Golan, RF
K. Klein, RL
G. Rudy, SR

cc:

E. Livingston, OSE
B. Costner, OSE
M. Whitaker, S-3.1

D. Michaels, EH-1
S. Cary, EH-1
M. Mathamel, EH-1

SAFETY ISSUE CORRECTIVE ACTION PROCESS

For specific Line Management Self-Assessments

1. **OBJECTIVE.** To establish a uniform process to carry out the Secretary of Energy's desire to identify, correct, and track safety issues related to Self-Assessments of (1) HEPA filter vulnerabilities at Nuclear Facilities and (2) Nuclear Criticality Safety. This guidance contains no new requirements, but rather presents a way to develop Corrective Action Plans (CAPS) and track individual corrective actions in the Department's Corrective Action Tracking System (CATS) in response to these Line Self-Assessments. The following guidelines are adapted from Appendix 2 of DOE O 414.1A, *Quality Assurance*.

2. **GENERAL REQUIREMENTS.**
 - a. DOE elements must correct safety issues (identified deficiencies) according to the importance of the problem and the work affected. Any Nuclear Safety non-compliances (under the Price Anderson Amendment Act) should be reported per existing procedures.

 - b. DOE elements must develop and implement a corrective action plan (CAP) for safety issues.

 - c. DOE Field/Operations Office Managers (Field Element Managers) must ensure that contractors within their purview implement the approved CAP, as appropriate. FEMs may assign responsibility for individual corrective action(s) to appropriate line managers. These Cognizant Line Managers (CLMs) are responsible to implement assigned corrective actions and keep the CATS updated on corrective action status.

 - d. DOE elements must apply this process to safety issue identification, CAP development, and dispute resolution.

 - e. DOE elements must use the DOE Corrective Action Tracking System (CATS) for CAP tracking and status reporting. Access to the CATS and password application can be obtained at: <http://tis.eh.doe.gov/portal/ism/CATS.htm>.

3. **SAFETY ISSUE IDENTIFICATION AND RESOLUTION PROCESS.**
 - a. **Safety Issue Identification.** The Field Element Manager must perform Self-Assessments in accordance with the Deputy Secretary's 11/03/1999 memorandum (Nuclear Criticality Self-Improvement Initiative); and the Secretary of Energy's 12/06/1999 letter (HEPA Filters) and the Deputy Secretary's 3/1/2000 memorandum (HEPA Filters in Nuclear Facilities). Relevant due dates have been established in these documents.

- (1) Describe each identified safety issue clearly in the assessment report. Safety issues will express the specific nature of the condition in a clear, concise, and direct manner that will allow line management to translate it into corrective actions.
 - (2) Verify the factual accuracy of the reported assessment findings with representatives of the assessed organizations.
 - (3) Submit the formal approved assessment report to the applicable Cognizant Secretarial Officer (CSO).
 - (4) FEM, or designee, will complete the "Report" and "Issue Information" data fields in the DOE CATS. The complete Data Dictionary and User's Guide for CATS is available at: <http://tis.eh.doe.gov/portal/ism/cats.htm>.
- b. Corrective Action Plan Development. The Field Element Manager must prepare the CAP to address the safety issues raised in the self-assessment report by performing the following:
- (1) Prepare a single, comprehensive CAP to address the safety issues contained in a given site-specific assessment report.
 - (2) The CAP must include actions to correct the safety issues (e.g., variance from established requirements), determine the causes of the issue, and prevent recurrence of the issue.
 - (3) The CAP must describe the basis for the disposition of each identified safety issue. If it is determined that no action will be taken in response to a given issue the CAP must describe the basis for this determination, demonstrating how safety will be maintained.
 - (4) The CAP must indicate the following for each safety issue requiring specific corrective actions: (Appendix A is an optional checklist/aid.)
 - a root cause/causal factor determination,
 - a description of the corrective action and which issues it addresses,
 - a description of how the corrective action will preclude future recurrence of the problem,
 - a deliverable which signifies action completion (report, new procedure or revision, calibration report, certification, etc.)
 - a single, responsible individual who is held accountable for timeliness and effectiveness of the corrective action,
 - the date the action is expected to be completed, and
 - the mechanism to be used to independently verify action completion and to provide assurance the actions taken will prevent recurrence.

- c. Corrective Action Plan Approval. The Field Element Manager must approve the CAP. The CLM must enter the “Corrective Action Plan” and “Corrective Action” data for the approved CAP in the DOE CATS. Again, the complete Data Dictionary and User’s Guide for CATS is available at: <http://tis.eh.doe.gov/portal/ism/cats.htm>.
- d. CAP Independent Technical Review. Self-Assessment is a Line Management function. Independent review of the associated CAPs is also a Line Management function. LPSOs will determine the method by which CAPs will be reviewed. An independent review will:
 - (1) Determine if the CAP provides timely or adequate corrective actions for all or part of the identified safety issues.
 - (2) Within 30 days of CAP approval, provide comments and their basis to the Field Element Manager and CLM when it is determined that the CAP does not provide timely or adequate corrective actions.
- e. CAP Comment Resolution. The CLM, in consultation with the Field Element Manager, must perform the following to address review group comments.
 - (1) Determine if a CAP revision is needed.
 - (2) Revise the CAP appropriately.
 - (3) Inform the review group how their comments were dispositioned.
- f. Dispute Resolution. The review group may choose to elevate their concerns regarding disposition of comments for dispute resolution in accordance with Paragraph 4, CAP ‘Dispute Resolution Process’.
- g. Deputy Secretary Briefing. The applicable LPSO must provide an opportunity for the Deputy Secretary (Department’s Chief Operating Officer) or designee to be briefed by the Field Element Manager. The briefing may include identified safety issues, the CAP and planned corrective actions, and any associated resource issues.
- h. CAP Implementation. The CLM must implement the approved CAP and complete the associated corrective actions.
 - (1) The CLM must track and report the implementation status of corrective actions. The status must be reported in the DOE CATS as the status changes or at least monthly, until the safety issue is closed.
 - (2) The review group may, at the direction of the LPSO, review the timeliness and adequacy of ongoing implementation of identified corrective actions.

Appendix A: Checklist for Reviewing Adequacy of Corrective Action Plans (CAPs)

No.:	Criteria	YES	NO
1	Has the Field Element Manager (FEM) prepared a single, comprehensive CAP to address all of the safety issues in the assessment report?		
2	Does the CAP clearly state the causes (the root cause(s) and causal factors) of the issue?		
3	Does the CAP describe the basis for the disposition of each identified safety issue?		
4	Does the CAP clearly state which corrective action(s) are responsive to the immediate condition/issue?		
5	Does the CAP clearly state which corrective action(s) are responsive to prevent recurrence of the issue?		
6	In the case that the FEM determines no action will be taken in response to a given safety issue, does the CAP describe the basis for this determination, and demonstrate how safety will be maintained?		
7	Does the CAP indicate for each corrective action the responsible individual (the Cognizant Line Manager [CLM])?		
8	Does the CAP indicate for each corrective action the expected date of completion?		
9	Does the CAP indicate for each corrective action the mechanism for the Line's independent verification of closure to ensure that the actions are appropriate to prevent recurrence?		
10	Does the CAP indicate for each safety issue the lessons learned for broader application?		

References:

1. DOE O 414.1A, "Quality Assurance"
2. DOE M 411.1-1A, "Safety Management Functions, Responsibilities and Authorities Manual"

Note: This checklist constitutes the minimum criteria for a CAP. Items 1 through 9 are based on requirements in reference 1; item 10 is based on requirements from reference 2.