

Department of Energy

Washington, DC 20585 April 3, 2000

The Honorable John T. Conway Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, NW. Suite 700 Washington, D.C. 20004

Dear Mr. Chairman:

This letter is in response to your November 9,1999, letter regarding safety management deficiencies and project management at the Y-12 Plant. The Department submitted a report on December 30, 1999, which included a list of project management root causes within the Department of Energy (DOE) organization, the contractor's organization, and on the interface between DOE and the contractor. A meeting with the Board's staff held at the Oak Ridge Operations Office (OR) on February 23, 2000, discussed the genesis of the root causes. They were developed by conducting analyses of the National Academy of Science Report on DOE Project Management, the Defense Programs Conceptual Execution Plan to improve Project Management, the Independent Assessment of the Hydrogen Fluoride Supply System project, and the Independent Review of Y-12 Capital Projects. The list of root causes was reviewed, and the corrective action plan strategy was validated by Paul Rice, a member of an external advisory team to DOE-OR and Lockheed Martin Energy Systems (LMES) for Project Management. The Department is providing the Corrective Action Plans (CAPs) for DOE (Enclosure 1) and LMES (Enclosure 2), addressing the root causes identified in the December 30, 1999, report.

The DOE and LMES CAPs are focused on rebuilding and reinforcing the fundamental infrastructure of project processes and procedures through implementing the fundamental guiding principles of Integrated Safety Management by: 1) establishing unambiguous and appropriate interfaces between DOE and LMES; 2) clearly defining and assigning project management roles and responsibilities; 3) establishing senior management's leadership roles and responsibilities; 4) developing and conducting required training; and 5) reviewing ongoing projects to ensure appropriate incorporation of planned corrective actions.

A key element of rebuilding and reinforcing project management infrastructure is the DOE-OR Defense Programs (DP) commitment to provide short-term and permanent qualified project management support. The DOE-OR DP is committed to: 1) fill the short-term needs from within the complex (or outside as necessary); and 2) support the needs identified in the long-term staffing plans, which are currently under development. These staffing plans will support the DP mission, and DOE-OR will communicate resource needs and funding requirements to DP at Headquarters.

The DOE Headquarters DP Construction Program Management Plan (CPMP) has been implemented as the basis for the management of projects. Local DOE implementation procedures are being developed. This suite of source and implementation procedures will provide clear definition of DOE's role as the project owner and contract manager. As part of

project definition, the mission requirements and safety standards for the project must be communicated to the contractor. Once these requirements have been accepted, the contractor executes the project management process outlined in the CPMP, obtaining DOE's approval at critical decision points in the project life. The DOE exercises design approval by rigorous technical review, ensuring the proposed contractor design meets system and safety requirements.

Throughout the execution of the DOE and LMES CAPs, the Y-12 Modernization Projects Advisory Team will be engaged to advise and assist DOE and LMES in their development and refinement of project management systems to ensure proper execution of major modernization and expense projects. The advisory team provides reviews and recommendations in critical project management areas including planning processes, execution, programmatic interfaces, DOE requirements, training, support systems, and proper incorporation of integrated safety management principles. The advisory team has met three times and provided reports with recommendations that have been shared with the Board's staff. In its most recent review during the week of March 13, 2000, they focused on the progress and effectiveness of the Independent Assessment of Hydrogen Fluoride Supply System Project corrective actions to strengthen project management performance in engineering, quality assurance, procurement, and operations. In addition, Mr. Rice has provided individual assistance to the DOE and LMES related to the development of the enclosed CAPs. He has provided input related to overall project management development strategy plan, coverage of development efforts, priorities of corrective actions, and roles and responsibilities.

The DOE and LMES CAPs are expected to be living documents that will be revised and updated, as a function of feedback and continuous improvement processes.

If you have any questions, please contact me or have your staff contact Dan Rhoades of my staff

THOMAS F. GIOCONDA Brigadier General, USAF Acting Deputy Administrator for Defense Programs

cc w/enclosures:

G. Leah Dever, OR

M. Whitaker, S-3.1

DOE PROJECT MANAGEMENT SYSTEM CORRECTIVE ACTION PLAN

NO.	ISSUE DESCRIPTION	Date Due	Manager	Status/Evidence of Completion
	() Indicates crosswalk of Root Causes in DOE Dec 30, 1999 Letter to DNFSB, see Note			
1	DOE-Headquarters Defense Programs (HQ DP) will provide direction for the interim use of the Construction Program Management Plan (CPMP) for near term projects and deal with any necessary changes when DOE institutional Project Management (PM) policies are issued. DOE will formally define the key project participants for Highly Enriched Uranium Materials Facility (HEUMF) and Special Materials Complex (SMC) projects within 30 days. (DOE 3)	2/28/00	Miotla/ Rhoades	Complete
2	Align/integrate DOE and contractor Project Management Program Procedures (DOE/LMES 1-2). Specifically:	6/1/00	Ooten	
	 A. DOE-ORO will establish the DOE-HQ DP CPMP with the contractor as the basis for management of projects and ensure that the Project Execution Plan for each line-item project incorporates all key practices and requirements identified in the plan for construction program management. (DOE/LMES 1-2), (DOE 3) Key elements to be achieved are: Define interface/points of contact between DOE-HQ, DOE-ORO, and the contractor 	3/21/00	Ooten	Completed
	 Define interface/points of contact between DOE-HQ, DOE-ORO, and the contractor Define clear roles, responsibilities, and authority for all project participants 			
	> Define the Senior Management authority and responsibilities			
	Define minimum project management processes; e.g., Risk Assessment/Risk Management, Project Reporting, etc.			
	> Insure that all DOE roles, responsibilities, and authorities are clear regarding its ultimate owner responsibility for the safe and cost effective execution of the project.			
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	B. DOE-ORO DP will identify any additional local DOE processes and procedures to be developed to address requirements in further detail beyond the CPMP. This includes, but is not limited to Level 2 Change Control; DOE-ORO DP oversight, formal DOE-ORO DP reviews, and approval actions (Title I design review, Critical Decision-3, etc.); DOE-ORO DP Project Engineer training; Project Risk Assessment; Application of ISM with Capital Projects; and Transition to Operations. (DOE 1&5) Specific action steps include:	6/1/00	Ooten	
	> Review other sites local procedures for applicability to ORO-DP.	4/1/00	Ooten	Complete
	Conduct review after completion of Item 7 below to identify project-related activities that require procedures.	4/1/00	Ooten	Complete
	Dobtain assistance from other DOE sites with contemporary experience in executing major projects.	4/1/00	Ooten	Complete John Phillips, SR Larry Furr, HQ Wayne Leslie, SR
	> Prepare Procedures	6/1/00	Ooten	•
	C. Local Procedures integrated as developed (See Item 1, LMES CAP)	ТВО		
3	DOE-ORO will reorganize to assign Project Engineers in the line organization with a result that: (DOE 2, 3)	12/31/99	Dever	Complete
	 Provides a direct path to Contracting Officer's Representative for direct influence of contractor performance 			
	Promotes interface with personnel from operations, technical support, and programs			
	Results in improved communications with DOE-ORO senior management including the identification of issues and problems requiring senior management attention			

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4	DOE ORO DP will provide adequate and qualified staffing pursuant to meeting long-term needs of the Modernization Program. These include the following critical items:			
	> Advertise and fill one senior level project management position to meet immediate needs	6/15/00	Brumley	
	Identify short-term temporary staffing requirements to fill the identified gaps in qualified project management.	4/15/00	Hoag	In Progress
	> Identify sources for short term staffing from either within the DOE complex or external through contracted support	4/15/00	Ooten/ Peters	
	> Fill these short term resource needs	4/30/00	Hoag	
	> Develop the ORO-DP input to the long term staffing plan for NNSA	4/15/00	Hoag	
5	The DOE-ORO Project Engineer will directly be involved in the selection, tailoring and approval of project specific procedures and plans that implement the requirements of the Project Execution Plan of line-item projects. (DOE 1)	On-going NOTE	Ooten/ Peters	Actions will integrate with Contractor project specific procedure development. (See Item 2, LMES CAP)
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6	Senior DOE-ORO and Contractor Management will charter an advisory team of outside experts in project management to assist both the contractor and the DOE-ORO in the development of processes, procedures, and practices related to the Modernization Program and other major line item and expense projects. (DOE 3, 4)	On-going	Dever/ Van Hook	Team Established - Complete
	> Initial Review of DOE-ORO DP Management System	1/26/00	Advisory Team	Complete
	> Assistance to the DOE-ORO DP Project Engineer in carrying out an effective owner's role and implementing the requirements of this corrective action plan	On-going	Advisory Team	Periodic reviews to evaluate progress.
	> Assistance to identify DOE-ORO DP project specific actions and the resources required for Highly Enriched Uranium Materials Facility (HEUMF) and Special Materials Complex (SMC)	3/13/00	Advisory Team	Complete
	Assistance to DOE-ORO to examine the entire project management process and identify DOE actions required, the resources needed for the actions, and the availability of technical resources to accomplish the actions	3/13/00	Advisory Team	Complete
	> Assistance to DOE-ORO and contractor senior management in defining their roles of oversight, steering and support of the specific projects	3/16/00	Advisory Team	Complete
	NOTE Refer to Item 4. Personnel resource needs to meet the demands of current and future engineering and construction activities.			
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7	DOE-ORO DP and DOE-HQ DP, with assistance from the external advisory team, will identify the time-phased scope of work activities required for DOE participants. These work activities will be resource loaded and scheduled, and commitments will be established to insure all work activities are accomplished in a timely manner. (DOE 1, 5)	5/30/00	Ooten/ Rhoades	
	> Identification of activities	4/15/00	Ooten/ Rhoades	
	> Schedule activities	4/30/00	Ooten/ Rhoades	
	> Resource load activities	5/30/00	Ooten/ Rhoades	
8	DOE-ORO DP, with assistance from the advisory team, will examine the technical features of each project and evaluate the potential gaps in local expertise (e.g. seismic, criticality, fire protection) to carry out the DOE functions and oversight responsibilities. Where gaps are determined to exist, outside expertise will be identified to close these gaps and planning for their procurement and use will be accomplished early in the project process. DOE-HQ DP will work with the PE to identify technical expertise available through HQ to close the gaps identified. (DOE 1, 5)	4/28/00	Ooten	Complete
	> Conduct initial review.	3/13/00	Ooten/ Peters	·
	> Identify gaps.	4/07/00	Ooten/ Peters	
	> HQ interaction to close the technical gaps.	4/14/00	Rhoades	
	> Define plan for obtaining other technical resources	4/28/00	Ooten/ Peters	

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	() Indicates crosswalk of Root Causes in DOE Dec 30, 1999 Letter to DNFSB, see Note			
9	DOE-HQ Program Sponsor will become knowledgeable of project specific plans and strategies and will review DOE-ORO DP specific planning actions for each project. (DOE 4)	6/1/00	Rhoades	Complete
	> Commence quarterly reviews on line-item projects.	1/28/00	Rhoades	Complete
	> Review and approve the HEUMF PEP	TBD	Rhoades	
	Review Monthly Project Status Reports	On-going	Rhoades	
,	Meet with the advisory team to discuss issues and the progress in dealing with advisory team recommendations.	6/1/00	Rhoades	
10	DOE-ORO will strengthen internal management assessment program direction to insure increased coverage of project activities. (DOE 4)	7/1/00	Dever	
	> Review existing management assessment programs	5/1/00	Ooten	
	> Identify gaps where increased coverage is needed	5/15/00	Ooten	
	> Implement appropriate management system changes	7/1/00	Brumley	
11	DOE-ORO DP will identify the DOE training and qualification requirements for each project. Specific training requirements will include but not be limited to training on all applicable DOE-ORO project management procedure; training on all project specific procedures; project management certification by an independent organization (e.g. PMI); Technical Qualification Program. (DOE 1, 5)	6/1/00	Ooten/ Peters	
	> Define DOE-ORO DP training criteria based on project specific characteristics	5/1/00	Ooten/	
	> Incorporate criteria into DOE-ORO DP procedures	6/1/00	Peters Ooten/ Peters	

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12	DOE-ORO DP will take a proactive roll in the execution of specific projects to insure adherence to the approved plans and procedures. Specific actions will include but not limited to: (DOE 1, 4)	On-going	Ooten/ Peters	
	> Direct participation of the DOE project engineer in the day-to-day project activities			Involvemented and an anima
	> Direct and active participation in the routine project team meetings			Implemented and on-going
	Monthly project reviews with the Assistant Manager Detense Programs and other involved DOE personnel			Implemented and on-going Initial Review Completed
	> Participation in the presentation of periodic project reviews to senior DOE and Contractor management			
13	The Manager, DOE-ORO, and the President, LMES, will be involved in periodic reviews of line item and mission critical expense projects to insure that all problems are being promptly identified and properly resolved. These reviews will insure that all project team members adhere to the PEP and other project directives. (DOE 4)	3/16/00	Dever/ Van Hook	Implemented and on-going
	Note:			
	• Reference is to root causes identified in DOE Letter to DNFSB - (DOE/LMES-X)			
	• Items in blue are priority and attainable within 6 months (September 2000)			
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Y-12 Modernization Projects Advisory Team Charter

February 25, 2000

Purpose

Ensure successful management of the planning and execution of major modernization, infrastructure, and expense projects at the Y-12 plant.

Goal

Review and evaluate major modernization construction projects. Review the Lockheed Martin Energy Systems and DOE-ORO DP organizations, procedures, and interfaces that are in place to support and execute major modernization, infrastructure and expense projects. Focus on planning, execution, programmatic interfaces (external and internal), DOE requirements, training, and support systems. Make recommendations to the President, Lockheed Martin Energy Systems, and the Manager, DOE-ORO.

Objectives

- Review planning processes, particularly integration of scope, deliverables, integrated safety management, milestones, and budget, to support programmatic needs and requirements.
- Review major projects from the perspective of evaluating strengths and weaknesses in the current project management approach and institutional support and identify potential systemic improvements, as appropriate.
- Examine management, organization, roles and responsibilities, and interfaces as they impact the planning and execution of major projects.
- Review the adequacy of policies, procedures, control systems, self-assessments, and underlying processes and support systems required for good project management.
- Assist Lockheed Martin Energy Systems and DOE-ORO DP in their development of contemporary project management tools and practices.

Guidelines

- The Modernization Projects Advisory Team reports to Robert Van Hook,
 President, Lockheed Martin Energy Systems and Leah Dever, Manager, DOE Oak
 Ridge Operations.
- Planned initial start of these activities is in December 1999, with follow up reviews conducted as necessary and appropriate.
- A report and recommendations will be delivered to the President, Lockheed Martin Energy Systems and the Manager, DOE-ORO upon the completion of each team review.
- From time to time, the President, Lockheed Martin Energy Systems or the Manager, DOE-ORO may request the assistance of individual advisory team members to provide input and advice targeted at specific project management improvement initiatives.

Advisory Team Members

Paul Rice, Project Management Consultant (Chair) Bill Bishop, Project Management Consultant Kevin O'Connor, Lockheed Martin Representative Gary Stanley, Bechtel Savannah River Ed Wilmot, DOE Representative

Panel Support

Mr. Tom Morris (Lockheed Martin Energy Systems)

Mr. Ron Ooten (DOE-ORO DP)

Mr. Joe Crociata (Lockheed Martin Energy Systems)

Leah Dever, Manager, DOE-ORO

Robert Van Hook, President, LMES

Lockheed Martin Energy Systems
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LOCKHEED MARTIN

Robert I. Van Hook President

March 3, 2000

Mr. Corey A. Cruz Acting Assistant Manager for Defense Programs Department of Energy, Oak Ridge Operations Post Office Box 2001 Oak Ridge, Tennessee 37831

Dear Mr. Cruz:

Contract DE-AC05-84OR21400, Response to Project Planning and Execution Issues

In response to the Defense Nuclear Facilities Safety Board (DNFSB) concerns with Y-12 Plant project management, Lockheed Martin Energy Systems (LMES) submitted a letter on December 2, 1999, to your office identifying the contractor's root causes for these project management problems and a commitment to submit a Y-12 Project Management Corrective Action Plan (CAP). The enclosed LMES Project Management CAP (Enclosure 1) has been coordinated with members of your staff. Paul Rice has continued to provide advice and assistance related to the CAP to both LMES and the Department of Energy, Oak Ridge Operations Office (DOE-ORO).

In analyzing the Y-12 project issues that led to the sequence of events resulting in inadequate safety management and insufficient attention to technical safety issues, the underlying root causes were determined to be systemic. The results of the Hydrogen Fluoride Supply System (HFSS) Independent Assessment, a Y-12 Engineering Functional Analysis conducted by Duke Engineering and Services, and a review of the Y-12 Quality Program conducted by Lockheed Martin Corporation, identified findings that encompassed all aspects of project management. However, these reviews did share a common set of underlying root causes, including the failure to establish the fundamental guiding principles of Integrated Safety Management in the existing project management infrastructure and the need to expand project management corrective actions beyond the specific issues indicated by the HFSS project failures. Therefore, in developing the LMES Project Management CAP, we address not only the findings of the different assessments but specifically identify corrective actions that will significantly strengthen project management programs and make safety management an integral part of Project Management.

The Project Management CAP is focused on rebuilding and reinforcing the fundamental infrastructure of project processes and procedures, establishing unambiguous and appropriate interfaces between LMES and DOE, clearly defining and assigning project management roles and responsibilities, establishing senior management's leadership roles and responsibilities, developing and conducting required training and reviewing ongoing projects to ensure appropriate incorporation of planned corrective actions. Throughout the development and execution of the Project Management CAP, we will continue to use the assistance of a team of outside experts, including the Y-12 Modernization Project Advisory Team.

The Y-12 Modernization Project Advisory Team has been retained to advise and assist the DOE and LMES in their development of contemporary project management systems to ensure proper execution of major modernization and expense projects. The advisory team provides reviews and recommendations in critical project management areas including planning processes, execution, programmatic interfaces, DOE requirements, training, support systems, and proper incorporation of integrated safety management principles. Paul Rice chairs this advisory team. The team has met twice and provided reports with recommendations that have been shared with the DNFSB staff. In addition, Mr. Rice has provided individual assistance to the DOE and the contractor related to the development of the enclosed CAP. He has provided inputs related to the overall project management development strategy, the extent of corrective action plan coverage, priorities of corrective actions, and roles and responsibilities. The next advisory team review is scheduled for the week of March 13, 2000, and will focus on the progress and effectiveness of corrective actions to strengthen project management performance in engineering, quality assurance, procurement and operations.

For Leah Dever's review and approval, enclosed is the charter for the Modernization Project Advisory Team (Enclosure 2).

The LMES Project Management System CAP (Enclosure 1) is expected to be a working plan that will be revised and updated as we proceed with its execution. The specific corrective actions have been prioritized and resource loaded to focus on the critical items we need to get in place to support the execution of the Modernization Project and Enriched Uranium Restart.

If you have any questions on the details of the enclosures, please contact Joe Crociata at 574-3793, who is leading the development, implementation, and execution of the Project Management CAP.

Sincerely,

Robert I. Van Hook

RIVH:jvq

Enclosures: As Stated

c: E. J. Bergin

T. R. Butz

W. L. Clements

H. T. Conner, Jr.

D. F. Craig

T. W. Morris

M. K. Morrow

R. I. Van Hook

P. R. Wasilko

c/enc: J. P. Crociata - RC

PROJECT MANAGEMENT SYSTEM CORRECTIVE ACTION PLAN

SUMMARY

Section I. Project Management Program Description and Implementing Procedures

- 1. Project Management Program Description
 - Blueprint of desired end state
 - Project Management Process Incorporation of ISM: addressing ISM Guiding Principles and Core Functions
 - Management roles and responsibilities identified
 - Identify owner of Project Management Procedure Process
 - Project Team concept
 - Roles and responsibilities of Project Team
 - Core project members
 - Project Plan Process
 - Project Plan requirements tailored to Project
 - Addresses DOE requirements
- 2. Project Management "Project Plan Procedure"
 - Graded process; tailored based on project cost, schedule, risk, safety, etc.
 - Justification for "NA" required
 - Tailoring Process identified in applicable Project Procedures covering
 - Line Item Projects,
 - Capital/General Projects, and
 - Expense Projects
 - Meets DOE requirement
- 3. Project Management Specific Project Type Procedures
 - Address these project types:
 - Line Item Projects
 - Capital/General Projects
 - Expense Project
 - Tailoring process for project plans identified in project procedure

Section II. Organization-Specific Project Management Corrective Actions

- 4. Y-12 Conduct of Engineering Improvement Plan
 - Developed by Technical Operations in coordination with Duke Engineering
 - Based on best commercial nuclear practices and Y-12 mission needs compared with current engineering practices
 - Issue Company Policy on assignment of Design Authority
 - Gap Analysis based on comparison of best practices to current state used to develop recommendation to change key engineering procedures
 - Develop draft implementation plan to address realigning of functions, assignment of Design Authority, and improvements to processes and procedures
 - Implement Plan

5. Configuration Management

- Assign ownership
- Revise Y-12 Operational Configuration Management Plan to integrate project management configuration management requirements into program
- Modify key Configuration Management Procedures to address project management configuration management

6. Quality Program

- Conduct independent assessment
- Based on independent assessment, propose structure and clear responsibilities for Quality Assurance
- Develop implementation plan for identified changes

7. Line Management Responsibilities Clearly Identified

- Reorganization established Technical Operations and Modernization Divisions
- Senior Management lead for Project Management Corrective Action Plan
- Revise Executive Steering Group charter to define Senior Management role in project planning and execution
- Perform independent assessment of procedural compliance

Section III. Review and Feedback of Y-12 Project Management Execution

- 8. Designate Outside Expert Team, Y-12 Modernization Project Advisory Team
 - Evaluate capability of the current Y-12 Project Management structure and processes
 - Conduct reviews of organizational corrective actions to address HF Independent Assessment
 - Provide on-going results of review as an input for update to Corrective Action Plan
- 9. HEU Storage Facility Project Management Review (Y-12 Modernization Project Advisory Team)
 - Provide recommended actions/path forward

- 10. EUO Startup Project Management Review
 - Provide recommended actions/path forward for EUO Startup Project
- 11. Independent assessment of selected ongoing projects and recently completed projects
 - Basis is the weaknesses identified during HF Assessment
 - Results correlated and provide potential inputs to Corrective Action Plan

Section IV. Project Management Training Program and Lessons Learned

- 12. Train appropriate line managers on HF Independent Assessment results
- 13. Identify Project Management training for LMES
 - Based on HF Independent Assessment results, review current Y-12 Training Program and recommend improvements as appropriate
 - Conduct Conduct of Operations (CONOPS) training for Operations, Engineering, Procurement, Quality Assurance, and ET&I personnel
 - Conduct training on new Project Management process and procedures as appropriate
 - Develop process to identify project-specific training for project teams
 - Evaluate the incorporation into the corporate Lessons Learned program a process to identify problems with specific vendors and the procurement of services and equipment. (HF PR-4)

Section V. HF System Corrective Actions

- 14. EUO addresses specific findings and recommendations of HF Independent Assessment
- 15. Complete independent verification of Technical Baseline of HF system

Cross-Reference Root Causes with Corrective Action Plan

	Root Causes	Corrective Action Plan Location
	Contractor Root Causes	
1.	Roles and responsibilities were not established to effectively execute projects. Design Authority is split among different organizations. (Defining work)	1.B(bullet 1), 2.E, 4.B, 6, 7.A and B
2.	Project management authority was not commensurate with responsibilities. (Affects all Integrated Safety Management functions)	1.B(bullets 1, 5), 2.E, 6
3.	Project management training and experience was not sufficient for the complexity and importance of projects. (Affects all Integrated Safety Management functions)	1.B(bullet 6), 2.C, 8, 9, 10, 11, 13
4.	Issue resolution organization did not provide timely/dedicated support for decision making. (Feedback)	1.B(bullets 9, 13), 2.DD
5.	Integration of project management with line function was not effective. (Affects all Integrated Safety Management functions)	1.B(bullets 1, 5)
6.	A lack of senior management attention and focus existed. (Affects all integrated safety management functions)	1.B(bullets 3, 4), 7.B
7.	There was a lack of control of program and functional requirements during project execution. (Defining work, analyzing hazards, establishing controls)	1.B (bullet 8), 2.S and U, 3, 5.D, 6
8.	A lack of training and execution to established processes and procedures existed. (Establishing controls)	1.B(bullet 6), 2.C, 7.C, 8, 12, 13
	Interface Between DOE and the Contr	actor
1.	DOE and contractor procedures were not effectively aligned/integrated. (All Integrated Safety Management functions affected.)	1.A
2.	Interfaces/points of contact between DOE and the contractor were not well defined. (All Integrated Safety Management functions affected.)	1.A, 1.B(bullet 1), 2.E

PROJECT MANAGEMENT SYSTEM CORRECTIVE ACTION PLAN

NO.	ISSUE DESCRIPTION	Date	Manager	Status/Evidence of
	*Indication of Y-12 institutional issue being addressed on project interface	Due		Completion
	() Indicates cross-walk of Root Causes, findings, and recommendations, see note 1			
	Section I. Project Management Program Description a	nd Imple	ementing Proce	edures
1.	Develop and issue a Y-12 project management program description that incorporates lessons learned from other DOE projects and best commercial practices and the recommendations of the outside expert team (Y-12 Modernization Project Advisory Team) as appropriate			
	A. Align/integrate DOE and contractor Project Management Program Procedures and define interfaces/points of contact between DOE and the contractor (DOE/LMES I-1, DOE/LMES I-2) to accomplish:	6/1/00	Morris/ Ooten	
	 DOE issue Construction Project Management Plan (CPMP) to define roles and responsibilities and interfaces for project. 			
	 Incorporate CPMP roles and responsibilities and interfaces into LMES Project Management Program Description. 			
	 Identify and review other DOE procedures to ensure requirement reflected in LMES Project Management Program Description (DOE 2). 			
	B. Develop a Project Management Program Description Document that is based on DOE Order 430.1A, (LCAM), DOE Construction Project Management Plan (draft), existing Y-12 project management procedures, fundamentals of ISM DOE Policy 450.4, and best practices of DOE and commercial projects. The Program description will include but is not limited to: (LMES 7; ORO PM 1, 2)	3/31/00	Burdett/ Crociata	
	Line management is responsible for safety:			
	 Define the Project Management ISM Roles and Responsibilities of Line Management, Engineering, Design Authority, Project Management, Facility/Criticality Safety, Quality Assurance, etc. (LMES 1, 5; ORO Vendor Quality 1-4; HF Recommendation 1) 			

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	*Indication of Y-12 institutional issue being addressed on project interface	Due		Completion
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- Identify ownership of Project Management Procedure Process
- Define the project-specific Senior Management Team (General Manager, responsible Line Manager, Technical Operations Director, and others as required) to interface with the individual Project Management. (LMES 5)
- Define the LMES Senior Management [Executive Steering Group (ESG)]
 Roles and Responsibilities for projects. (LMES 6)

Clear roles and responsibilities must be articulated:

• Define the project team core members, basic roles, responsibilities, and authority. (LMES 1, 2)

Competence must be commensurate with responsibilities assigned:

 Identify the process for development of baseline training and qualification requirements for Project Management Personnel and project team members. (HF Recommendation 2)

Balanced priorities must be set:

Hazards controls must be tailored to the work performed:

Operations must be authorized:

- Identify the Project Plan as an implementation blueprint for project execution, organization, and administrative strategy. The tailoring of Project Plan requirements will be based on cost, risk safety, and schedule, etc.
- Define the process for selecting, tailoring, approving, training, and change control for project-specific procedures
- Identify the process and responsibilities that will be utilized to track and resolve technical and administrative issues (LMES 4)

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	*Indication of Y-12 institutional issue being addressed on project interface	Due		Completion
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Safety standards and requirements must be identified:

- Define a clear description of the hierarchy of project policies, procedures, and plans that would include the relationships to institutional procedures and plans (LMES/DOE interfaces plans and procedures, PEP, CPMP)
- Identify minimum requirements (contractual, legal, SRIDs, etc.)
- Define Program description change process.
- Summarize the execution of the ISM Core Functions Wheel during the completion of the five critical decision phases of project execution. (Develop the requirements, Plan the work, Endorse the project, Execute the work, Transition and closeout)
- 2. Project Plans will be prepared for each specific project. The sections of the Project Plan are addressed in Y13-XXX INS. The Y13-XXX INS series will also contain project management procedures covering project execution processes and requirements and provides guidance for tailoring the project plan to the specific project. A checklist will be used to identify the required elements of the project plan. Where project cost, schedule, risks, safety, etc. do not require a specific element, "NA" shall be entered and justification provided in the remarks section of the checklist for each NA prior to approval of the Project Plan. The following Project Plan sections will be addressed:
 - A. Mission need justification
 - B. Project description summary of technical and functional performance objectives for the project, as well as Project Baselines (technical, cost and schedule) (ORO PM 1)
 - C. Specific training of project team members for the associated project (LMES 3)
 - D. Systems Engineering requirements.

4/15/00 Morris

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	*Indication of Y-12 institutional issue being addressed on project interface	Due		Completion
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- E. Project Management Team approach and specific system to be used including: (LMES 2)
 - Detailed organization structure,
 - Roles and responsibilities and authorities, including decision authority from Headquarters and DOE Field Element program, and
 - Project Management Team support functions (expanded team) such as health physics, safety, NEPA, etc.
- F. Engineering trade-off studies
- G. System Design Description Process
- H. Resource Plan including a short description of funding and expenditure plans to include the total project cost profile, budget by funding category, and total project cost plan.
- I. Identification of project-specific procedures and plans.
- J. Project controls system and reporting. (LMES 8)
- K. A Work Breakdown Structure to working level 3 elements
- L. A schedule listing of major events, with a discernible critical path, major milestones, Critical Decision points, and their anticipated approval dates.
- M. Line Management develop as appropriate a list of required Process Descriptions and the scheduled completion dates.
- N. The process for PSAR/SAR development and approval. (HF SA 1, 2)
- O. Identification and documentation of Criticality Safety evaluations, requirements, and inspections/test (HF CS 3, 4)
- P. Identification and documentation of SSCs in the PHA, Design Specifications, and QA Surveillance Plans (HF SA 3, 4)

О.	ISSUE DESCRIPTION	Date	Manager	Status/Evidence of
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	Q. QA Plan (HF CM 4)			
	R. Risk Assessment and Risk Management Plan			
	S. Configuration Management Plan			
	T. Acquisition Strategy			
	U. The approval/signature requirements for all members of the project team.			
	V. Use of contingencies			
	W. References to applicable Department of Energy Orders and Standards (HF SA 1)			
	X. Earned value measuring tools to be used to evaluate project controls.			
	Y. Testing and acceptance criteria (HF CM 3)			
	Z. Technical Baseline Requirements			
	AA. Transition Plan (HF OP 1)			
	BB. Operations Readiness Requirements for operation of equipment or facilities			
	CC. Change Control Process (HF CM 1)			
	DD. Identify the methodology to resolve technical and administrative issues (LMES 4; HF CM 5)			
	EE. Waste Management Plan			
	FF. Security Plan			

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3.	Develop site-wide procedures, Y13-XXX INS, to address: Line Item Projects, Capital	4/15/00	Morris	
	Equipment Projects/General Plant Projects, and Expense Projects specifically			
	addressing the requirements of the tailoring for project plans.			
	A. Line Item Projects (Y13-XXXINS) issued.			
	PEP identified as subset of Project Plan.			
	B. Capital Equipment Projects/General Plant Projects (Y13-XXXINS) issued.			
	C. Expense projects (Y13-XXXINS) issued.		-	
	Section II. Organization-Specific Project Manage	ement Co	rrective Actio	ons
*4.	Technical Operations, with support from Duke Engineering, is developing and implementing a Y-12 Conduct of Engineering Improvement Project to improve Y-12 Conduct of Engineering based on best commercial nuclear practices and Y-12 mission needs (HF Recommendation 3):			
	A. Compare the current state engineering functions at Y-12 with best practice organization(s) and develop recommendations for improvement that is based on:	11/10/99	Craig	Complete/Report, "Y-12 Engineering Functional Analysis,
	Interview key personnel across Y-12			Rev. 1"
	 Develop current state functional matrix and current state functional organization chart 			
	 Develop best practice functional matrix and best practice functional organization chart 			
	Analyze differences and develop recommendations to use as input to Company			

10.	ISSUE DESCRIPTION	Date	Manager	Status/Evidence of
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	 () Indicates cross-walk of Root Causes, findings, and recommendations, see note 1 B. Develop and issue a Company policy that clearly assigns Design Authority at Y-12 by: (LMES I) Develop draft Design Authority Policy assigning Design Authority to Engineering 	12/6/99	Craig	Complete/LMES Policy Y12-02 Policy on Design Authority
	LMES President approves Policy			
	C. Identify and analyze gaps between current state critical Conduct of Engineering processes and procedures and those of best practice organization(s) and develop recommendations for improvement by:	1/14/00	Craig	Complete/Report, "Y-12 Conduction of Engineering and Command Media Analysis"
	• Identify critical processes and procedures. This includes, but is not limited to:			
	 Y17-001, Engineering, Design, and Construction Process 			
	 Y17-69-401, Engineering Process Interface for Projects 			
	 Y17-69-402, Minor Modifications 			
	 Y17-69-403, Minor Construction Modifications 			
	 Y17-69-404, Drawing Control Interface 			
	 Y15-187, Integrated Safety and Change Control Process 			
	 Y10-37-036, Configuration Management – Change Control Process 			
	 Y10-153, Temporary Modification Control 			
	 Y15-001INS, Grading Criteria for Y-12 Facility and Systems 			
	 Y74-809, Unreviewed Safety Question Determinations 			
	 EP-C-02, Squad Check for Design Drawing 			
	 EP-C-20, Design Analysis and Calculations 			
	 EP-C-22, Equipment Specifications 			
	 Perform functional decomposition of current state processes and procedures and ensure all quality procedures and processes are addressed 			

VO.	ISSUE DESCRIPTION	Date	Manager	Status/Evidence of
	*Indication of Y-12 institutional issue being addressed on project interface	Due		Completion
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	Perform best practice functional decomposition			
	Identify gaps, analyze and prioritize differences			
	Generate procedure revision schedule based on prioritization			
	D. Develop draft Implementation Plan that addresses the realignment of functions, assignment of Design Authority and recommendations for improvements in processes and procedures based on best practice organization(s).	2/1/00	Craig	Complete/Report, "Y-12 Design Authority Implementation Plan," draft 1/29/00
	E. Finalize the Implementation Plan to improve Conduct of Engineering at Y-12 by:	3/1/00	Craig	Complete
	A Proposed Plan that will:			
	 Define, establish, and communicate functional roles, responsibilities, and interfaces for implementing the new Design Authority Policy and improving Conduct of Engineering consistent with the revised LMES organizational structure. 			
	 Upgrade Engineering work processes and procedures to implement Design Authority and improve Conduct of Engineering by specifically addressing areas such as SSC grading, initiation of changes and change control, configuration management, design output for procurement and construction, technical oversight, non-conformances, and documentation and records. 			
	 Identify knowledge gaps, address qualifications and skills, and conduct training to address new and revised roles and responsibilities, processes, and procedures. 			
	 Establish a performance measurement system to monitor, analyze, and trend Engineering work process performance to provide feedback for performance improvement. 			
	 Develop an integrated schedule and estimate resources for implementing the Plan. 			

NO.		ISSUE DESCRIPTION dication of Y-12 institutional issue being addressed on project interface Indicates cross-walk of Root Causes, findings, and recommendations, see note 1	Date Due	Manager	Status/Evidence of Completion
		Present plan to senior management for acceptance and resource commitment	3/1/00	Craig	Complete
	G.	Incorporate Implementation Plan into this corrective action plan	3/31/00	Craig	
	Н.	Welding		,	
		Address MK-Ferguson concerns identified in 1998 Assessment of HF Supply Line Welding (HF SW-5)	6/24/99	Craig	Complete/Evidence Package, D. Etzler
5.	Coı	nfiguration Management (CM) Program Review			
	A.	Determine ownership of the configuration management process	11/30/99	Morrow	Complete
	B.	Develop and submit to senior management for approval a Y-12 Configuration Management Program Description (Y/ES-110) that incorporates a lifecycle approach so that design, procurement, construction, and transition to Operations are integrated in the program. (ORO CM 1-7; HF Recommendation 6)	3/31/00	Craig/ assisted by Reed	
	C.	Conduct a review of key CM implementing procedures/processes and identify modifications needed to meet requirements of the CM Program Description.	4/20/00	Craig/ assisted by Reed	
	D.	Upgrade Y15-001INS, "Grading Criteria for Y-12 Facilities and Systems." The upgraded procedure shall incorporate: (a) Technical Operations ownership of the design basis documentation, (b) documentation of the SSC grading in a calculation format, (c) requirements to grade all new SSCs, including non-nuclear hazardous SSCs to new criteria. (HF CM 1, 3; HF CS-1)	5/31/00	Craig/ assisted by Crowley	
	E.	Provide input to the engineering procedures and work processes that need revision or improvement to meet the CM requirements.	3/31/00	Reed .	

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NO.	ISSUE DESCRIPTION	Date	Manager	Status/Evidence of
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	() Indicates cross-walk of Root Causes, findings, and recommendations, see note 1			
	F. Revise/develop and issue CM implementing procedures as necessary to meet the CM Program Description to extend the CM Program to design, procurement, construction, and turnover and to incorporate the design authority role. This includes but is not limited the following procedures: (LMES 7)	5/31/00	Craig/ assisted by Reed	
	• Y15-187, "Integrated Safety and Change Control process"			
	 Y15-002, "Configuration Control of Equipment Data Sheets" 			
	Y15-003, "Equivalency Evaluation"			
	 Y60-705, "Acquisition, Control, and Traceability of Procured Safety SSCs" 			
	• EP-E-02, "Configuration Management"			
	• EP-C-21, "Turnover Plans"			
*6.	Quality Program Review.			
	A. Conduct independent assessment of LMES Quality Program, addressing the recommendations from the independent assessment of HF	10/31/99	Butz	Complete
	B. Develop an upgraded Quality Program based on the Quality Program Independent Assessment results and propose a structure and clear responsibilities for the Quality Assurance organization within Y-12 such that it meets ISM principles and expectations. Ensure the following are addressed as a minimum: (HF Recommendation 4, HF VQ-1, 2)	4/28/00	Butz	
	 Roles and Responsibilities for Quality Assurance Supervisor with respect to the Project Team Charter and the PEP. 			
	Roles and Responsibilities of personnel performing QA roles at vendor sites.			
	 The prioritization of Field Quality Representative activities in QA surveillance plans 			

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	 Project QA requirements to perform independent surveillances and audits as appropriate. 			
	C. Develop a resource-loaded implementation schedule for the identified upgrades.	5/15/00	Butz	
	D. Obtain Senior Management approval of the upgraded LMES Quality Program.	6/01/00	Butz	
7.	Line Management Project responsibilities are clearly established. (LMES 1)			
	A. President of LMES will implement actions to:			
	 Clearly reiterate management expectations for procedural compliance throughout Y-12. (ORO-2; HF PR-3; HF CM 1, 2, 4; HF OP-1, 3) 	10/28/99	Van Hook	Complete
	 Reorganize to establish a Technical Operations to focus on a consolidated and clarified Design Authority role and a Modernization organization to focus on the Project Management Process 	1/17/00	Van Hook	Complete
	Establish Senior Management lead for corrective action plan	11/30/99	Van Hook	Complete
	 Provide weekly reports on the status of the Project Management Corrective Action Plan to LMES President. 	On- going	Crociata	
	 Conduct monthly review meetings with senior line managers on Project Management Corrective Action Plan status 	On- going	Crociata	
	 Bring on a Senior Advisory Team of recognized Project Management experts to mentor DOE and LMES on project oversight and execution 	11/99	Van Hook	Complete
	Bring on experienced outside contractor to mentor EUO process-based restart	11/99	Van Hook	Complete
	B. Revise the Executive Steering Group (ESG) Charter to define the designated senior management steering groups for projects. The assignment of ESG designated personnel and their required reviews will be tailored to the project size, safety, complexity, and risks of the specific projects. (LMES 6, ORO PM-1; HF Rec 7)	4/30/00	Cochran	

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NO.	*Indication of Y-12 institutional issue being addressed on project interface () Indicates cross-walk of Root Causes, findings, and recommendations, see note 1	Date Due	Manager	Status/Evidence of Completion
	C. Perform independent assessments of procedural compliance in selected Operations and Non-Operations organizations. (LMES 8)	4/7/00	Stalnaker	
	Section III. Review and Feedback of Y-12 Project	Manage	ment Execut	ion
8.	Designate an outside expert team, Y-12 Modernization Project Advisory Team (Paul Rice, Chairman) and have them evaluate the capability of the current Y-12 Project Management Structure and processes. The evaluation will include review of issues identified in the HF independent assessment. (HF Recommendation 14)	Began 12/31/99	Morris	Complete (Rice/Bishop/O'Conn Wilmont/Stanley)
	A. Y-12 Modernization Project Advisory Team second review scheduled for 24 Jan visit.	1/24/00	Morris	Complete
	B. Y-12 Modernization Project Advisory Team conduct reviews of the institutional organizations that are crucial in project support and are applying significant corrective actions as the result of the assessment of the HF Project. These include Engineering, QA, Procurement, and Operations.	3/31/00	Morris	
	C. Based on the results of the Project Advisory Team members reviews, update this Corrective Action Plan as appropriate.	On- going	Crociata	
9.	HEU Storage Facility Project Management Review by the Y-12 Modernization Projects Advisory Team Recommended Actions/Path Forward for HEU Facility			
	A. Develop a short-term (6-moonth) schedule, including the specific resource loading requirements for accomplishment. This schedule must include all actions necessary to achieve high-quality project baselines, a satisfactory completion of work necessary to request customer approval of CD2, and all actions required ensuring high-quality RFP documents.	2/25/00	Herron	Complete
	B. Develop near-term actions that define and formalize the interfaces and roles and responsibilities of all project participants including the project execution team, senior Y-12 contractor and DOE management, and DP-20 key sponsors.	3/31/00	Herron/ Ooten	

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		dication of Y-12 institutional issue being addressed on project interface Indicates cross-walk of Root Causes, findings, and recommendations, see note 1	Due		Completion
		Develop Functional and Operational Requirements in a manner that results in a clear picture of the fundamental basis for safety evaluation, design specifications, or the preparation of a design-build RFP.	4/28/00	Herron	
	D.	Prepare and issue Project Procedures (See item 2, 3)	4/28/00	Herron	
	E.	Complete facility systems identification and process descriptions			
	F.	Upgrade current project organization charts, formal organization descriptions, and definitions of roles and responsibilities to establish a clear understanding of the "Project Team" definition and senior management sponsorship. (See item 1)	2/25/00	Herron	Complete
	G.	Upgrade the Project Execution Plan (PEP) for the Highly Enriched Uranium Materials Facility project to meet basic PEP objectives. The following areas are to be addressed:	3/31/00	Herron	
		Define core project team members			
		Define the Senior Management interface for the HEU project			
		• Identify project planning and scheduling resources to support ongoing project reporting, tracking and change control activities.			
		Review and upgrade the project technical and schedule baselines.			
		• Incorporate a contemporary quantitative cost/schedule risk assessment to fully identify major risk areas, quantify the impact of these risks, and provide the needed input for risk management and risk mitigation plans.			
					•

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	() Indicates cross-walk of Root Causes, findings, and recommendations, see note 1	11/11/99	Morris	Complete
10.	Enriched Uranium Operations (EUO) Startup Project Management Review by Paul Rice/Leo Sain	11/11/99	MOLLIS	Complete
	A. Recommended actions/Path Sequence for EUO Startup Project:	3/31/00	Conner	
	Form the EUO Startup Project Core Team			
	• Immediately obtain additional Project/Scheduling resources.			
	• Develop 60-day Rolling Schedule with some near-term milestones.			
	• Develop a simple set of Project Procedures.			
	• Identify remaining scope and integrate into the schedule baseline.			
	Estimate and resource load all work identified.			
	Conduct a Quantitative Risk Assessment and Contingency Determination.			
	 Senior Project Management conduct a quality/completeness review of new baselines. 			
	Obtain formal signup/commitment to scope, schedule, and baselines.			
11.	Conduct independent assessments of selected non-Modernization ongoing projects and recently completed projects, specifically reviewing weaknesses identified during the HF Independent Assessment. (HF Recommendation 12, 13)	5/15/00	Altman	Independent Advisory Group will review results
	A. Lithium Process Replacement	9/99	Muenzer	Line Mgt. and PEG review complete
	Crusher/Grinder	12/99		Line Mgt. and PEG review complete
	Generators	12/99		Line Mgt. and PEG review complete
	Kerf Collectors	1/00		Line Mgt. and PEG review complete
	Machine Dust Dumping	2/00		
	Deuterium Plant	4/00		
	Reactors From parties (Neutralization)	5/00		
L	Evaporation/Neutralization			

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	B. Enriched Uranium Operations			*
	9212 HP Vacuum Pump 0212 NFPA F. Wing Harreds	3/00 3/00	Stone	
	• 9212 NFPA E-Wing Upgrade	3/00		
	C. Line Item Projects			
	• 3500-Ton Press	12/99	Altman	Complete
	SMRI Upgrades	3/00		
	SECTION IV. Project Management Training Prog	ram and	Lessons Lea	rned
	SECTION IN TOJOU NEMEROM EN MARINE EN OF		Descons Den	
12.	Train appropriate line managers on the results of the HFSS Independent Assessment. (HF Recommendation 8)	10/29/99	Crociata	Complete
13.	A. Complete a review of the HFSS Independent Assessment and recommend appropriate training improvements or additions to the Y-12 training program. These are as follows: (LMES 8, DOE 1; HF Recommendation 9)	11/19/99	Ruth	
	B. Conduct Operations Training for appropriate personnel in Operations and Engineering, Procurement, and QA, and ET&I on: (HF CM-2; HF VQ 1, 2; HF Rec. 3, 5)	05/00	Ruth	
	 Chapter 1 Section IV.C and D: Organization Interface, Authorization Basis Maintenance 			
	• Chapter 2.1 Section IV.C: Taking and Recording Data			
	 Chapter 8 Section IV.A and B: Designation of SSCs Requiring Control, Deficiency 			
	Chapter 10, Independent Verification			
	• Chapter 16, Procedure Use and Compliance (HF PR 1-3; HF TW 3; HF OP 1)			

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	Configuration Management Process			
	 Non-Conformance Reports, Temporary Modification and Field Change Notice requirements (HF OP 2, 3, 4) 			
	C. Conduct training as appropriate after approval of new Project Management Program Description, project procedures, and other LMES procedure changes (LMES 3)	05/00	Ruth	
	• Engineering and Project Teams (HF CS 2)			
	 Project Management Program and Process for management and project members 			
	 Design Authority roles and responsibilities 			
	 Role of originator, checker, and approver as applied to design drawings, specifications, and calculations 			
	 Technical Baseline Training 			
	 Change Control Process 			
	 Acquisition, Control, and Traceability of procured Safety SSCs 			
	 Engineering training on welding (HF TW 1) 			
	➤ Implementation of ASME B31.3 inspection and nondestructive testing requirements (HF SW 3)			
	Ensuring welder performance testing was adequate for the application (HF SW 2)			
	Implementation of ASME B31.3 inspecting and nondestructive testing requirements (HF SW 3)			
	➤ Implementation of ASME B31.3 record criteria for welds. (HF SW 4)			

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	Procurement (HF PR 1, 2, 3)			Completed for HEU facility
	 Roles and Responsibilities 			
	 Acquisition, Control, and Traceability of procured safety SSCs 			
	Quality Assurance			Completed for HEU facility
	 Roles and Responsibilities 			·
	 Audit and Surveillance performance training 			
	• ET&I			
	 Roles and Responsibilities 			
	Audit and Surveillance performance training			
	D. Develop process to identify project-specific training for project core team members as identified in each PMP. (LMES 3)	6/1/00	Morris	Complete for HEU Project for Review of DOE Order 420.1, Facility Safety; Competitive Procurement Proposal Evaluation DOE-STD-3024-98, Systems
				Design Document; UCNI Computing Overview; and Design Build Proposal Preparation
	E. Evaluate the incorporation into the corporate Lessons Learned program a process to identify problems with specific vendors and the procurement of services and equipment. (HF PR 4)	6/1/00	Morris	
	Section V. HF System Corrective	Actions		
14.	EUO shall incorporate the specific findings and recommendations of the HF Independent Assessment into the overall EUO/PBR HFSS schedule of milestone events. (HF Rec 10; HF TW-1-3; HF SA 2-4; HF VQ-1, 2; HF CM-1, 2, 4, 5; HF OP-1-4; HF CS-1-4)	6/1/01	Conner	

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15.	Complete independent verification of technical baseline of the HF System prior to the	≈3/29/00	Stalnaker	
	system ORR. (HF Rec 11)			

Notes:

- ♦ For the HF Independent Assessment findings, corrective action #11 in this plan indicates where the corrective action is identified in the EUO/PBR corrective action plan.
- The individual corrective actions are associated with the corresponding corrective action from the HF Independent Assessment, Y/MA-7534, DOE letter to the DNFSB, ORO Independent review of DP Projects, and HF Recommendation letter to DOE.
 - (LMES/DOE-X) reference is to root causes identified in DOE Letter to DNFSB
 - (ORO-X) reference is to findings identified in the ORO Independent Review of DP Projects
 - (HF Rec) reference is recommendations made in result of the HF investigation.
 - (HF XX-X) reference to the HF Investigation Report