

Directive Number and Title:

DOE Order 210.1, Performance Indicators and Analysis of Operations Information

Originating Office:

Office of Environmental, Safety and Health

Review Team Members:

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Background:

This Order applies to contractors awarded contracts for the operation and management of DOE-owned and leased facilities. The Order was originally issued to: 1) obtain operational ES&H related data from the field to analyze and trend at the corporate level; and 2) require contractors to have ES&H performance indicators for the purpose of evaluating performance. Due to the lag time in obtaining data, analyses were deemed of questionable value to senior DOE management (both in the field and HQs). Efforts are ongoing to improve HQs corporate capability and methods to evaluate ES&H performance.

Analysis:

Based upon the review team's knowledge of this Order, in its present form, little data or information is actually reported by contractors to EH. Comments from DOE field offices and contractors recommend that the Order be canceled because it duplicates requirements of other reporting systems. When the review team evaluated these comments, it was determined that many of the reports did duplicate those required under DOE Orders 231.1 "ES&H Reporting" and the CAIRS system and 232.1 "Occurrence Reporting and Processing of Operations Information" and the ORPPS system. It was also determined that the standard terms and conditions in performance-based contracts also require this type of data so that again, some duplication occurs. Yet, from the DOE HQ's standpoint, the concept and intent of the Order may still be valid. If DOE management believes that a HQs performance indicator/operational analysis program is needed, then the Order should be re-written to better delineate performance objectives. The Order's sole function would be to require contractors to provide data.

Recommendation:

Option 1: Revise the Order and limit its application to the provision of data for a HQs performance indicators/operational analysis program. This will be consistent with and supportive of the project plan resulting from the Executive Safety Conference.

Option 2: Cancel the Order now and reassess the need for this type of data when reviewing the CAIRS and ORPPs systems which indicates that some modifications of these systems may be necessary. Thus, if DOE management determines that it has a continuing need for the type of data required under this Order, we recommend that reporting requirements be added to CAIRs or ORPPS reporting systems.

Minority Views:

None.

Originating Office Comments:

None.

Summary of Comments Received:

See attached.

Field Comments on DOE Orders

Organization Field Office, Site,	Comments on DOE 210.1 Ch 2	Comments on Other Orders
Albuquerque (AL)	No comment	Yes
CH	Retain, but limit applicability. CH, like many field offices, has met its responsibilities in the order by incorporation of special clauses that address development and assessment of performance measures. Therefore applicability of the CRD should be optional for those contracts that already contain the requirements set forth therein. [On DNFSB interest list]	Yes
CH/BSA	<p>This order should be eliminated for the following reasons:</p> <ul style="list-style-type: none"> • Value added elements are redundant with prime contract Article 6, Use of Objective Standards of Performance, Self-Assessment and Performance Evaluation • Value added elements are redundant with feedback and improvement and performance monitoring requirements of DEAR 970.5204, Integration of Environment, Safety, and Health Into Work Planning and Execution (contract article 72) • In many ways this order is also redundant with assessment requirements of Order 414.1, Quality Assurance 	Yes
Idaho Operations Office (ID)	This entire directive is duplicative of DOE O 414.1A Chg 1, Quality Assurance, Criterion 3, and 10 CFR 830.122 (c).	Yes
ID M&O	Delete this directive as it implements Public Law	Yes
Nevada	Not directly, generic for all DOE orders	Sort of
OAK/LLNL	Review process and period does not allow adequate time to conduct comprehensive review on ES&H directives	Yes
OAK	This order can be eliminated since it does not have any requirements that are not already covered by performance based contracting. This Order was due to be reviewed in 1997, but evidently never was reviewed.	Yes
Oak Ridge	No comments	yes
Richland	No comments	yes
SNL	No comments	yes
SR	No comments	yes
Yucca Mountain Site Characterization Office	Page 1: This text in bullets 2 and 3 appears overly prescriptive and defines processes and methods to achieve outcomes.	