Department of Energy
National Nuclear Security Administration
Washington, DC 20585

November 10, 2004

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

In his July 13, 2004 letter to you on Facility Representative (FR) staffing and training deficiencies, Ambassador Brooks tasked me to lead a team to develop guidance for continuing FR training and a more rigorous FR staffing analysis model.

The team completed its work on the two commitments in early October. Members of your staff were involved in the team's deliberations. Mr. Jerald Paul, Principal Deputy Administrator for NNSA, forwarded the documents to NNSA site managers on October 13, 2004 and directed that both the implementation of the guidance and staffing analysis be completed by December 15, 2004. A copy of Mr. Paul's letter is attached.

The Administrator's July 13, 2004 letter directed that Mr. John Evans and I conduct an assessment of site implementation of the guidance and staffing analysis two months after implementation. Accordingly with the December 15, 2004 due date established by Mr. Paul, I expect to commence our review in mid February 2005 and complete all NNSA sites by the end of March 2005.

Sincerely,

Emil D. Morrow
Senior Technical Advisor
For Safety and Operations NNSA

Attachment

cc: Mark Whitaker DR-1

Department of Energy
National Nuclear Security Administration
Washington, DC 20585

October 13, 2004

MEMORANDUM FOR: Manager, Y-12 Site Office (YSO)
Manager, Savannah River Site Office (SRO)
Manager, Pantex Site Office (PSO)
Manager, Kansas City Site Office (KSO)
Manager, Los Alamos Site Office (LASO)
Manager, Sandia Site Office (SSO)
Manager, Livermore Site Office (LSO)
Manager, Nevada Site Office (NSO)
Manager, Service Center (NZ)

FROM: Jerald S. Paul
Principal Deputy Administrator

SUBJECT: Promulgation of Headquarter Guidance on Facility Representative Training and Facility Representative Staffing Analysis

On July 13, 2004 Ambassador Brooks responded to a Defense Nuclear Facilities Safety Board letter on Facility Representative (FR) staffing and training deficiencies. He stated that we would develop guidance for continuing FR training and we would develop a more rigorous staffing analysis model for determining the number of FR's required.

A team composed of Headquarters personnel and personnel from each Site have developed the two documents attached to this letter. Additionally, I understand that you have been briefed on their contents.

Accordingly, Site Managers are to implement a formal FR continuing training program as outlined in the attached guidance. Conduct a FR staffing analysis using the attached staffing analysis model. Both actions should be completed by December 15, 2004. Please notify me when your training program has been initiated, and notify me when your staffing analysis is completed. Please copy Emil Morrow regarding all correspondence on this subject.

Do not hesitate to call me if you have any questions, or have your staff call Emil Morrow at 202/586-5530.

Thank you.

Attachments

cc:

Everet Beckner, NA-10
Karen Boardman, Service Center, NZ
David Crandall, NA-11
Marty Schoenbauer, NA-12 (Acting)

NNSA Headquarters Guidance on Continuing Training for Facility Representatives

OBJECTIVE

This guide establishes direction for the development of site-specific processes so National Nuclear Security Administration (NNSA) Facility Representatives (FRs) are aware of significant new hazards or activities they may encounter during the performance of their duties.

The purpose of this guide is to provide a structured approach for supplementing the hazard and activity-related information FRs receive after completing the qualification process established by DOE.

APPLICABILITY

This guidance applies to all NNSA Facility Representative programs.

GUIDANCE

This guidance should be incorporated into site Facility Representative continuing training requirements. Each NNSA Site should develop a formal process to identify new or significant changes to hazards and activities in a timely manner, submit that information to the manager responsible for continuing training, determine whether or not additional training is required, and conduct and document the training. Sites are cautioned not to overburden Facility Representatives with the responsibility for identifying new hazards and activities. Instead, programmatic and subject matter experts should be involved in the "identification" phase of the process described below. The following describes criteria that should be considered in developing that process.

FR candidates should participate in the continuing training program so they remain aware of new or significant changes to site-specific hazards or activities subsequent to their training and qualification period.

1. Identify

New or significant changes to hazards and activities that could have an impact on safety should be identified as soon as possible through a process established and endorsed by management. The site process should ensure that appropriate programmatic and subject matter experts review and summarize the relevant information and provide that information to the manager responsible for facility representative continuing training. The manager responsible for facility representative training should determine the required training (See 3. "Training").

The following are examples of information that should be reviewed to identify new or significantly changed site-specific hazards or activities:

a. Positive Unreviewed Safety Questions (USQs).
b. Annual updates to Documented Safety Analyses (DSAs).
c. New DSAs and associated Safety Evaluation Reports (SERs).
d. Justifications for Continuing Operation (JCOs).
e. Changes to Technical Safety Requirements (TSRs).
f. Authorization Agreement changes.
g. New or significantly changed processes that require Process Hazards Analyses (PHAs) or equivalent documents.
h. Significant changes to emergency or abnormal operations procedures.
i. Reviews associated with significant start-up or re-start activities (e.g., Readiness Assessment / Operational Readiness Review, Joint Nuclear Readiness Team, or Nuclear Explosive Safety Study).
j. Critical Decisions (e.g., CD-3).
k. Accident investigation reports.
l. Changes to occurrence reporting requirements.

2 Analyze

New or significant changes to hazards and activities should be evaluated to determine whether additional training is necessary on significant new hazards or activities. A record of information reviewed or considered for training should be maintained.

3. Train

Facility Representatives, Safety System Oversight (SSO) or other appropriate SMEs (including site contractor personnel) should conduct the training. The training should be provided to all facility representatives and should be considered for other appropriate subject matter experts.

Classroom training (lecture or seminar), structured self-study (using a lesson plan, handout, or required reading), and walkdowns/tours are all examples of acceptable training methods.

4. Revise

The current site-specific FR qualification standard(s) should be reviewed to determine if it should be revised to incorporate new information. If so, the revision should be performed in accordance with site procedures.

5. Document

All training provided should be documented, and attendance should be tracked to verify that affected FRs received training. Training records should be sent to the site training office.

PROCEDURE

NNSA Site Offices are to use this guidance to meet the OBJECTIVE. Site Offices may use an alternate approach provided the intent of the guidance is met and the Site Office documents how the alternate approach meets the intent of the guidance. DOE-HDBK-1118-99, *Guide to Good Practices for Continuing Training*, is a useful reference for developing any continuing training procedure.

9/26/04

Process to Determine Facility Representative Staffing

Overview

The steps below describe an analytical process to determine Facility Representative staffing for all hazardous facilities at a site. The process builds on the guidance in DOE-STD-1063-2000, *Facility Representatives*. This method provides a technical approach to determine the appropriate amount of Facility Representative oversight necessary for a facility given its hazard level, operational activity and complexity, and programmatic importance. It also supports implementation of the President's Management Agenda on Human Capital, ensuring the Department has the necessary skills and resources available to carry out its missions and effectively oversee operations at its hazardous facilities.

Methodology

The following elements shall be included in each site analysis:

1. A relative ranking of facilities based on hazards or risks present to the public, worker, and environment.
2. A frequency for determining Facility Representative coverage (i.e., continual, frequent, occasional, etc.) based on facility categorization and adjusted for other factors identified in DOE-STD-1063-2000 such as facility size, operations complexity, hazards and risks.
3. A determination of Facility Representative FTE requirements based on coverage assigned.
4. A determination of actual manning based on Facility Representative FTE requirements and actual staff time available to support the Facility Representative functions when competing activities such as collateral duties, leave, training, etc. are considered.

Procedures

Procedures for conducting a Facility Representative staffing analysis follow each table. Tables 1-4 describe the process to determine Facility Representative FTE levels for facilities or groups of facilities. Tables 5-6 represent two methods of determining actual staffing levels necessary to meet the FTE level, taking into account the duties, responsibilities, leave, and training typical of Facility Representatives at each site.

Table 1 – Facility Hazard Value (Facility 1, 2, and 3 provided as examples)

Facility or Groups of Facilities	Radiation Exposure			Criticality			Biological			Hazardous Chemicals			Lasers			Electricity			Cryogens			High Pressure			Hoisting & Rigging			Construction or D&D			Explosives			Fire			Facility Hazard Value
	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	public	worker	environment	
Facility 1	2	3	1	0	2	0	0	0	0	0	1	1	0	0	0	0	2	0	0	0	0	0	1	0	0	2	0	0	1	0	1	1	0	1	2	0	21
Facility 2	0	2	1	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	1	0	0	1	0	0	0	0	0	1	0	10
Facility 3	0	1	0	0	0	0	2	3	2	1	2	1	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	15

Procedure to Complete Table 1 – Facility Hazard Value

1. List all hazardous facilities or groups of facilities in the left column.
2. List types of hazards across the top row. These should include the hazards within a facility, such as radiation exposure, criticality, hazardous chemicals, electrical, cryogens, lasers, explosives, construction or D&D, hoisting & rigging, and other hazards in the facility.
3. Evaluate each hazard at each facility based on the relative magnitude of the hazard to the public, worker, and environment. The evaluation should include the complete spectrum of hazards in the facility that could expose members of the public, onsite workers, facility workers and the environment to hazardous materials. The ranking system used in this example is as follows: high hazard – 3, moderate hazard – 2, low hazard – 1, no hazard - 0. Definitions for hazard categorization are as follows:
   High – Potential off-site impacts to large numbers of people or on-site significant impacts to many workers from a single event.
   Moderate – Potential on-site significant consequences. Potential significant impacts to workers or the environment, but at most only minor off-site impacts. Potential significant impacts to collocated workers.
   Low – Potential for significant localized consequences and minor on-site impacts to collocated workers and negligible off-site impacts to public and the environment.
4. Sum the facility hazards across each row to determine the Facility Hazard Value.
5. Enter these values in Table 2, column b.

Table 2 - Determination of Facility Coverage Priority Ranking (Facility 1, 2, and 3 provided as examples)

Facility or Groups of Facilities	Facility Hazard Value (From Table 1)	Facility Size	Material Condition	Operations Complexity	Programmatic Importance	Operational Rigor	Coverage Priority Ranking*
a	b	c	d	e	f	g	h
Facility 1	21	1.25	1	1.25	1	1	33
Facility 2	10	1	1	1	1	1.25	13
Facility 3	15	0.75	0.75	1	1.25	1	11

* Facility Representative coverage is optional for non-nuclear facilities with a Coverage Priority Ranking below 15.

Procedure to Complete Table 2 – Determination of Facility Coverage Priority Ranking

The Coverage Priority Ranking is an adjustment to the Facility Hazard Value based on factors such as facility size, material condition, operations complexity, programmatic importance, and operational rigor. The Coverage Priority Ranking is calculated by multiplying facility hazard value by the modifying factors (h=b*c*d*e*f*g). Other factors appropriate for a particular site or facility may also be used. The Coverage Priority Ranking determines the priority of assigning Facility Representatives to a facility or group of facilities based on the hazards present as modified by these factors. Sort facilities by Coverage Priority Ranking from highest to lowest. The modifying factors are defined as follows:

Facility Size (c):
- 0.75 – Operations areas less than 10,000 square feet
- 1.00 – Operations areas between 10,000 square feet and 100,000 square feet
- 1.25 – Operations areas greater than 100,000 square feet

Material Condition (d):
- 0.75 – Configuration management program is mature, as-built drawings are reasonably accurate, material management/pedigree programs are in place, replacement parts for safety systems are available, safety systems are reliable, condition similar to what one would expect for a new or well maintained facility
- 1.00 – Between .75 and 1.25
- 1.25 – As-built drawings are unavailable or very out-of-date, replacement parts for safety systems are hard to get or unavailable, safety system reliability is degraded, condition similar to what one would expect for an old or poorly maintained facility

Operations Complexity (e):
- 0.75 – Majority of the following conditions are present: One primary program/function, less than 250 employees, single chain-of-command, modest level of expertise and training required to operate
- 1.00 – Between .75 and 1.25
- 1.25 – Majority of the following conditions are present: Multiple distinct programs/functions, many different activities/disciplines, many different tenants or chains-of-command, greater than 500 employees, high level of expertise and training required to operate

Programmatic Importance (f):
- 0.75 - Unplanned outages for up to 30 days will not negatively affect DOE Strategic Plan deliverables or objectives
- 1.00 - Limited impact on the DOE Strategic Plan deliverables or objectives as a result of unplanned outages for up to 30 days
- 1.25 - Significant impact on DOE Strategic Plan deliverables or objectives as a result of unplanned outages exceeding 30 days

Operational Rigor (g):

0.75 – Well implemented Conduct of Operations Programs. Within the last year, zero of the following significant events/accidents: radiation over-exposures or uptakes, injuries requiring hospitalization, lockout/tagout violations, or environmental releases. Within the last year, zero TSR/AB violations. Contractor integrated management systems are verified mature.

1.00 - Between .75 and 1.25

1.25 - Conduct of Operations is poorly implemented. Within the last year, two or more of the following significant events/accidents: radiation over-exposures or uptakes, injuries requiring hospitalization, lockout/tagout violations, or environmental releases. Within the last year, more than three TSR/AB violations. Contractor integrated management systems not mature.

Table 3 - Determination of Facility Representative Coverage (Facility 1, 2, and 3 provided as examples)

Facility or Groups of Facilities	Coverage Priority Ranking* (from Table 2 column h)	Facility Categorization	Facility Activity Level	Recommended Base Coverage Level	Initial FTE Coverage Level	Adjusted FTE Coverage Level	Recommended FTE Coverage Level	Percentage of Time Available to Provide FR Coverage (From Table 5)	Final FTE Coverage Level
a	h	i	j	k	l	m	n	o	p
Facility 1	33	Nuclear Haz Cat 2	High	Frequent (0.50 – 1.00)	1.00	1.25	1.50	0.77	1.95
Facility 2	13	Nuclear Haz Cat 3	High	Intermittent (0.25 – 0.50)	0.50	0.50	0.50	0.77	0.65
Facility 3	11	Biosafety Level 3	Medium	Intermittent (0.25 – 0.50)	0.25	0.25	0.25	0.77	0.32
						Total	**2.25**		**2.92**

* Facility Representative coverage is optional for non-nuclear facilities with a Coverage Priority Ranking below 15.

Procedure to Complete Table 3 – Determination of Facility Representative Coverage

1. List each facility or groups of facilities for which Facility Representative coverage is desired, according to the facility's Coverage Priority Ranking (columns a, h). Facility Representative coverage is optional for non-nuclear facilities with a Coverage Priority Ranking below 15. This allows site offices flexibility to perform oversight on these facilities using personnel other than Facility Representatives.
2. Determine the Facility Categorization. Use Table 4, Recommended Facility Representative Base Coverage Levels, to determine the Facility Categorization and enter into column i.
3. Determine Facility Activity Level. Use the guidance in DOE-STD-1063-2000, *Facility Representatives*, paragraph 5.1.b. and enter in column j. The activity level definitions are:

   HIGH: Facilities that daily to weekly involve activities related to hazardous operations.
   MEDIUM: Facilities that weekly to monthly involve activities related to hazardous operations.
   LOW: Facilities that monthly to quarterly involve activities related to hazardous operations.

4. Recommended Base Coverage Level (column k). Use Table 4 to determine the Recommended Base Coverage Level for a facility (Continual, Frequent, Occasional, etc.) based on the Facility Categorization and Facility Activity Level and enter in column k. The definitions for the Recommended Base Coverage Level are in DOE-STD-1063-2000, Table 2:

   CONTINUAL: The Facility Representative is present daily. This coverage may require the complete attention of one or more individuals and may require back shift, weekend, or 24-hour coverage. If the normally-assigned Facility Representative is gone for one week or longer, the Field Element Manager should name a temporary replacement and establish an appropriate coverage schedule.

   FREQUENT: The Facility Representative is present approximately half of the time. One person can cover multiple facilities. If the normally-assigned Facility Representative is gone for two weeks or longer, the Field Element Manager should name a temporary replacement and establish an appropriate coverage schedule.

   INTERMITTENT: The Facility Representative is present at least one day per week. One person can cover several such facilities.

   OCCASSIONAL: The Facility Representative visits the facility 12-24 days a year.

   SELDOM: The Facility Representative visits the facility 6-12 days a year.

   The Recommended Base Coverage Levels correspond to the following Recommended FTE Levels:

Recommended Base Coverage Level	Recommended FTE Level
CONTINUAL	> 1.00
FREQUENT	0.50 – 1.00
INTERMITTENT	0.25 – 0.50
OCCASIONAL	0.10 – 0.25
SELDOM	< 0.10

5. Initial FTE Coverage Level (column l). Determine the appropriate initial FTE coverage level from the recommended FTE Level and place in column l.
6. Adjusted FTE Coverage Level (column m). Multiply the FTE Coverage Level (column l) by an Adjustment Factor in the table below, and put the result in column m. This ensures that facilities with the highest hazards, operational activity, complexity, and of greatest programmatic importance receive higher coverage. The Adjustment Factors are:

Coverage Priority Ranking Value	Adjustment Factor
> 100	2.00
50 - 99	1.50
25 - 49	1.25
< 25	No Adjustment

7. Recommended FTE Coverage Level (column n). Following establishment of the Adjusted FTE Coverage Level (column m) for each facility, the Field Element Manager (FEM) may further adjust the level of coverage. This adjustment should take into consideration factors such as those listed below and should be based on the FEM's judgment of the contractor's operational performance:
   - Facility operations involving multiple shifts
   - History of contractor performance for similar activities
   - Potential for DOE or public interest

- The risks to successful mission accompl ment
- Financial risks
- Complexity of the facility and facility op ations
- Hazardous work environments for work
- Age, maintenance condition, and level o ncertainty of the facility
- Anticipated changes in operational statu f facility
- Number of significant accidents/inciden n site
- Amount of other DOE technical facility ersight

8. The next step is to adjust the Recommended FTE overage Level to account for additional duties assigned to Facility Repr ntative as well as other competing activities. This can be done by using Table 5 or T le 6. Table 5 is used if sites can accurately estimate other activities for group of Facility Representatives at the site. Table 6 is used if Facility Representatives ha different collateral duties from each other which would make using Ta 5 impractical. Both Table 5 and Table 6 represent workload analyses to ensure that the F ility Representative coverage assigned is achievable given the other du s assigned to the Facility Representatives.

Table 4 – Recommended Facility Representative Base Coverage Levels

Chemical Hazards Class[1]	Biological Hazard Level[2]	Nuclear Hazard Categorization[3]	Other Hazardous & Unique Facilities[4]	Facility Activity Level		
				High	Medium	Low
	Biosafety Level 4	Category 1 Hazard		Continual	Frequent	Intermittent
Facilities with regulated hazardous material requiring a Risk Management Plan OR The potential for ERPG-2 levels or TEEL-2 for off-site	Biosafety Level 3	Category 2 Hazard	Facilities that pose a significant risk offsite	Frequent	Intermittent	Occasional
Facilities with regulated hazardous material requiring a Risk Management Plan OR The potential for ERPG-2 levels or TEEL-2 for collocated worker (100M)	Biosafety Level 2	Category 3 Hazard	Facilities that pose a significant risk to on-site workers	Intermittent	Occasional	Seldom
Inventories of flammable materials and reactive compounds exceeding threshold quantities in 29 CFR 1910.119		Radiological Facilities	Facilities that have a critical mission and require additional oversight	Occasional	Seldom	Coverage Optional

Notes:

1. Chemical hazard classes are established by OSHA and EPA. Regulated Toxic and Regulated Flammable Substances and their Threshold Quantities are listed in 40 CFR Part 68.130. Extremely Hazardous Substances and Threshold Planning Quantities are listed in 40 CFR Part 355, Appendices A and B. Process Safety Management chemicals are listed in 29 CFR 1910.119.
2. Biological hazard levels are defined in *Biosafety in Microbiological and Biomedical Laboratories*, U.S. Department of Health and Human Services Centers for Disease Control and Prevention and National Institutes of Health Fourth Edition, May 1999
3. Nuclear hazard categorization is from DOE-STD-1027-92, (CH-1) *Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports*
4. Unique Facilities are identified by Field Element Manager that could pose a significant risk to public or worker safety or crucial mission facilities that require Facility Representative oversight. Consideration could include poor operational or safety performance, special needs, and significant public concern.

Table 5 – Facility Representative Available Time for Coverage, Generic Analysis

FR Activity that does not provide oversight of his/her assigned facility or increases facility oversight time*	Average Time required to perform identified activity across the FR Program being analyzed	Hours required to perform identified activity annually
Annual Leave	6 hours per pay period	-156
Sick Leave	1 week per year	-40
Administrative Duties	10% of time	-208
Training	3 weeks per year	-120
Collateral Duties	3 hours per week at work	-132
Special Assignments	1 week	-40
Overtime	10%	+208
Available Time Adjustment		-488
Percentage of Time Available to provide FR Coverage (2080 + Available Time Adjustment / 2080)		**0.77**
Staff Required to meet FR coverage required on Table 3 and additional activities identified on this table (FTE Required from Table 3 / Percentage of time Available)		2.25/0.77 = **2.92**

* Activities that reduce FR coverage are negative, activities that increase FR coverage (overtime, staff detailed to provide backup oversight, etc.) are positive

Procedure to Complete Table 5 – Facility Representative Available Time for Coverage, Generic Analysis

This method identifies a uniform factor that can be applied to the Recommended FTE Coverage Level derived in Table 3 (column o) to determine the actual number of staff required to meet the minimum coverage requirement when activities that compete with Facility Representative duties are considered. Attachment 1 lists some of the activities that may need to be considered; sites should develop the list applicable to their Facility Representative Program. This method works well when the non-FR activities completed by Facility Representatives are relatively uniform across the organization.

1. Identify activities performed by Facility Representatives in addition to the evaluated Facility Representative duties.
2. Determine the average amount of time spent performing those activities across the Facility Representative Program, either as a percentage of work time or on an annual basis.
3. Calculate the total percentage of time available to perform Facility Representative functions.
4. Divide the total number in Table 3 column m by the percentage of time spent performing non-Facility Representative activities to determine the staffing required to achieve the effective Facility Representative staff required.
5. For Facility Representatives in training, increase training time from 120 hrs per year or 7% to an appropriate value (e.g., approximately 25% or 400 hrs per year).

Table 6 - Facility Representative Available Time for Coverage, Assignment Specific Analysis

(Facility 1, 2, and 3 provided as examples)

Facility Coverage Groupings	Staff Assigned / Total Hours Available	Collateral Duty Assignments and Estimated Time Commitments [hours/year]		Leave, Admin, Training Time [hours/year]	Effective Facility Coverage [Hours]	Effective Facility Coverage [FTE]	Recommended Coverage	Is Effective Coverage Acceptable? Yes/No (If no, describe additional measures)
Facility 1	FR A FR B FR C	SSO Program Coordination DOE RA Duty Officer Program Management Radiological Assistant Program Duty Officer DOE Accident Investigation	200 80 75 40 32 160	525 525 525				
	6240		587	1575	4078	2.0	1.50	yes
Facility 2	FR D	EEO/Special Emphasis Coordinator Duty Officer HQ Program Manager Liaison	100 32 500	525				SSO coverage will occur at about 0.05 FTE to make up the oversight difference. Need to re-evaluate in 6 months for effectiveness.
	2080		632	525	923	0.44	0.50	no
Facility 3	FR E	FR Training Manager Duty Officer Criticality Engineer Overtime	500 32 250 -100	525				
	2080		682	525	873	0.42	0.25	yes

Procedure to Complete Table 6 – Facility Representative Available Time for Coverage, Assignment Specific Analysis

This method evaluates the actual staff time available for performing Facility Representative functions based on individual Facility Representative assignments, and compares that number with the Table 3-derived Recommended FTE Coverage Level (Table 3, column n) to determine if staffing is adequate or should be modified. This method works well when the non-Facility Representative activity time requirements vary considerably between Facility Representatives.

1. List facility/facility groupings with the Facility Representatives\ assignments.
2. Sum the total man-hours assigned; on an annual basis this is typically 2080 hours times the number of Facility Representatives assigned.
3. List the collateral duty assignments, leave, special assignments, and other activities that are not Facility Representative activities that will be completed by the assigned Facility Representatives.

4. Sum the total man-hours spent performing these activities
5. For Facility Representatives in training, increase training time from 120 hrs per year or 7% to an appropriate value (e.g., approximately 25% or 400 hrs per year).
6. Subtract the total number of hours spent performing the non-Facility Representative activities from the total Facility Representative hours assigned.
7. Divide the total available hours determined in the above step by 2080 to determine the effective FTE available to perform Facility Representative duties.
8. Compare the effective FTE available to perform the Facility Representative duties with the Table 3-derived Recommended FTE Coverage Level (Table 3, column n) to determine if staffing is adequate or should be modified.

Attachment 1 - Examples of Activities that acility Representatives May Perform in Addition to Facility Representative Duties

Activity	Examples	
Collateral Duties*	ORPS process	nagement
	Conduct of Ope	ions Implementation
	Readiness Revi	Process
	Duty Officer Pr	ram Management
Site Office Support	Integrated Proj	Teams
	Special Empha	/ EEO Program Site Rep
	NNSA Duty Of	er
	Radiological A	stance Program Team Leaders
Special Assignments*	Readiness Revi	Team Members
	Accident Invest	ation Team Members
	Special Contrac	Project Partnering Team Members
	NNSA Policy T	ms
	Contract Sourc	valuation Board Support
	Management S	ort Teams
Training	Continuing Tra	ng
	Mandatory Tra	g
	Qualification/R	ualification Training
	Access Trainin	
	Personal Devel	ment Training
Administrative Duties	Time Keeping	
	Training Regist	ion
	Travel	
	Performance In	ator Tracking
	Surveys	
	Personnel Acti	es
	Document Rev	s (RevCom, FRAM, internal policies)
	E-mail manage	nt
Leave	Annual	
	Sick	
	Military	

*These are intended to describe duties that are perfor d on the institutional level or at facilities different from the FR's assigned facility. Examples: (1) Participation on a readiness review at another site or a facility differen om the FR's assigned facility is still oversight of the contractor, however, the FR is not providing oversight at his/her assigned facility so this is considered a compe g activity; however, technical support to a readiness review team or participation on a readiness review team at the FR's assigned facility is not a competing activity and considered part of the FR's assigned coverage duties. (2) Evaluating Occurrence Reports for the FR's assigned facility is part of the FR's assigned coverage duties; h vever, managing site-wide implementation of ORPS, performing as a subject area SME, developing and evaluating site-wide performance of contract measures, process i rpretations, reengineering efforts, etc. are collateral duties beyond those expected for FR facility coverage.