Ensuring Effective and Efficient Contractor Oversight

Rocky Flats Field Office
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Presentation to the
Defense Nuclear Facilities Safety Board
December 4, 2003
Contractor Oversight Structure

- Guidance Documents
  - DOE P 450.4, Safety Management System Policy (ISMS)
  - EM-1 memo, 5/23/03, EM Project Oversight and Assessment Policy
  - RFFO M 220.2A, Closure Project Oversight Program Manual (CPOP)

- Line Responsibility and Accountability
  - Manager to Direct Reports (3) to Staff
  - Senior Safety Advisor in Manager’s Office
  - Facility Rep’s have Stop Work authority and direct access to Manager

- Current challenges
  - DOE/RFFO in transition
  - Site closure is entering most dynamic phase
  - FR role and AB processes provide continuity and stability
Contractor Oversight Activities

- **Formal**
  - Authorization Basis approval and change process
  - DOE Monthly Safety evaluation review
  - Quarterly K-H Safety Review meeting
  - DOE assessments and Joint DOE/K-H assessments*
  - Quarterly Contract Fee evaluation and Fee Determining criteria
  - Joint Evaluation Team (JET)

- **Informal**
  - Daily Facility Representative interaction
  - Weekly DOE Management workspace tours and surveillances*
  - Weekly “1 on 1” with K-H Senior Management
  - Bi-weekly “1 on 1” with K-H Safety VP

- **Participatory**
  - Daily Safety Analysis Center (SAC) meeting and Event Summary
  - Weekly K-H Joint Union-Management Safety review meeting

* = Needs significant improvement
DOE Self-Assessment

- **Self-Assessment Program**
  - The keystone of DOE/RFFO oversight is self assessment
  - RFFO M 220.2A (CPOP), Chapter 8 - Self Assessment
  - Results captured in Oversight and Evaluation (O&E) database

- **Scheduled Self-Assessments**
  - Structured and comprehensive; Evaluate programs and processes
  - Criteria Based Upon DOE Orders, Guidance, Policies, Manuals, and RFFO Procedures and internal guidance
  - Two required per year per Direct Report (RFFO M 220.2A)

- **Unscheduled Self-Assessments**
  - Flexible and focused; Evaluate events and operations
  - Workspace tours, data analysis, review of employee performance data, and management performance reviews
  - Greatest value in dynamic D&D environment
DOE Technical Staffing

- Staffing needs established per DOE-STD-1063-2000 and EM policy
  - Tailored to balance effectiveness and efficiency
  - Analysis completed Feb 2003; updated July 2003; re-look Feb 2004
- Risks eliminated during 2003
  - PuSPS processing completed
  - All CAT I and II Pu shipped
  - Protected Area eliminated
  - B-886 (EU Criticality Facility) demolished
  - B-865 (high Be contamination) demolished
  - B-771, B-776/777, and B-559 declared criticality incredible (2 remain)
  - 903 Pad completed
- Remaining key technical skill needs
  - Fire Protection - Radiation Protection
  - Risk Analysis - Authorization Basis
  - Beryllium - Industrial Hygiene
  - IWCP / Work Controls - Environmental / Waste management
  - Criticality Engineering (until April 2004)
DOE Technical Staffing (cont.)

• RFFO Staffing Changes

<table>
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<th>Mgmt/Admin.</th>
<th>Technical</th>
<th>Fac. Rep.</th>
<th>Safe Work Resources</th>
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<td>83</td>
<td>14</td>
<td>62%</td>
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<tr>
<td>Post-RIF</td>
<td>16</td>
<td>33</td>
<td>9</td>
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• Post-RIF Organization will re-focus Line Management oversight
  – Line lead for formal K-H assessments and self assessments in Jan 2004
  – Formal assessment schedule in Feb 2004
  – Senior Management policy for workspace tours in Jan 2004

• FR roles re-clarified per DOE-STD-1063-2000 in Dec 2003
  – FR’s maintain day-to-day operational oversight for Line Management
  – Senior Safety Advisor serves as FR Program Sponsor
Conforming with EM-HQ Guidance

- **Historical Oversight**
  - Driven by multiple DOE policies and orders
  - RFFO CPOP integrated and provided single-point focus
  - Line Management accountability has drifted
    » Viewed as Safety Program organization function
    » Distraction of management and staff changes

- **Conformance with DOE 226.1 (Draft) and EM policy**
  - Strong philosophical alignment
    » RFFO CPOP already incorporates much of 226.1
    » K-H Contract already includes much of 226.1 CRD
  - Full implementation expected within 6 months of final

- **Transition Planning**
  - Already in transition due to other factors
  - Organizational actions being aligned to anticipate final 226.1
Learning from the Columbia Investigation

- Review of the investigation report
  - Read and discussed by Senior DOE and K-H Managers
  - Distributed to next management level to review

- Key learnings for Rocky Flats
  - Overconfidence based on past success – “the good safety stats trap”
  - Rationalizing nonconformance – “believe your instruments”
  - Communication breakdowns – “eliminate stovepipes”

- Response to Columbia learnings
  - Daily SAC and Event reviews seek leading indicators and trends
  - AB and waiver processes require Manager-level approvals
  - Flat and flexible RFFO organization improves communication
  - Management workspace tours increase management awareness
  - FR’s maintain “operational awareness” with direct line to Manager
Corrective Action Program

- Corrective Action Program defined by K-H Procedure 3-X31-CAP-001
  - RFFO-identified deficiencies
  - PAAA issues
  - Site NCRs
  - Program or Management deficiencies
  - WIPP deficiencies
  - NTS deficiencies
  - Other Externally-identified deficiencies
- DOE tracking to resolution
  - Weekly review of Plant Action Tracking System (PATS)
  - Weekly review of overall safety performance metrics tracked in other databases (i.e., Radiological Incident Reports)
  - Minor Issues tracked daily though SAFETY ANALYSIS CENTER
Corrective Action Program (cont.)

- Causal Analysis (CA)
  - Causal Analysis Defined by MAN-062-CAUSEANALYSIS
  - CA Program provides Significance Screening
  - High Significance Issues receive formal Causal Analysis
    » Barrier Analysis
    » Change Analysis
    » MORT
    » Event and Causal Factors Charting
    » Phoenix Handbook
  - Low Significance items (e.g., ORPS Significance Category 3 or 4) use Direct Derivation Method

- The Site’s Corrective Action Program has undergone several significant revisions and is robust and mature, but…
  - Continuous improvement and vigilance are a requirement
  - Increasing focus to screening and CA of potential leading events
Oversight Summary

- Contractor Oversight
  - Tailored for current closure mission
  - DOE transitions provide for strengthen line accountability and focused FR roles
  - Rocky Flats oversight program will ensure safe closure completion