

**Office of Safety and
Emergency Management Evaluations
Protocol for
Small Team Oversight
Activities**



June 2012

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**Office of Enforcement and Oversight
Office of Health, Safety and Security
U.S. Department of Energy**

**Office of Safety and
Emergency Management Evaluations Protocol for
Small Team Oversight Activities**

June 2012

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1.0 PURPOSE

The purpose of this protocol is to establish the requirements and responsibilities for conducting and managing an Office of Health, Safety and Security (HSS) small team oversight activity. These activities are the primary means of gathering independent performance data to support the independent oversight function. Some examples of these oversight activities include reviews of technical areas and operations, performing reviews that are concurrent with line management activities, observing selected site meetings and operational safety-related activities, and conducting management-directed reviews of site-specific safety concerns. This protocol further discusses and categorizes these activities as oversight and operational awareness activities. When appropriate and consistent with the independent oversight function, independent oversight reviews may be conducted at the request of Department line management in accordance with this protocol.

2.0 APPLICABILITY

This protocol is applicable to the Office of Safety and Emergency Management Evaluations.

3.0 REQUIREMENTS

General

- This protocol only applies to HSS oversight activities involving a small number of Office of Safety and Emergency Management Evaluations technical resources (typically one to three individuals) with a short (or no planned) onsite presence.
- HSS Office of Safety and Emergency Management Evaluations inspection activities are to be performed in accordance with DOE Order 227.1, *Independent Oversight Process*, and applicable Office of Safety and Emergency Management Evaluations guides and criteria, review, and approach documents (CRADs).
- The selected team members must possess qualifications, competencies, and experience commensurate with their intended responsibilities and must be free of any potential conflict of interest.
- Available background information will be provided and reviewed by the assigned team members for the purpose of planning, consistent with operational and schedule constraints.
- Site and program security limitations regarding the use of personal electronic equipment and the requirements for site computers and local area network (LAN) access, safety and security training, and personal protective equipment (PPE) pertinent to the planned activity will be determined and followed. Protection requirements for classified information and controlled unclassified information (CUI) associated with the activity will also be determined and followed.
- When differences in scheduling of activities or issue resolution arise with the organization being reviewed, they are raised to the next level of management in accordance with DOE O 227.1, *Independent Oversight Program*.

Oversight Activities

- HSS small team activities include targeted reviews, small-scope appraisals, concurrent reviews, and shadowing of line or contractor oversight activities.
- The following activity details will be provided in a plan or approved charter:
 - Purpose
 - Scope
 - Schedule
 - Team composition
 - Lead and individual assignments
 - Documentation and potential follow-up requirements
 - DOE site office point of contact (POC) and team interface requirements.
- All reviews will be conducted utilizing an approved CRAD and/or an approved plan that includes equivalent information.
- To the maximum extent possible, documents will be provided to team members for review, initial review activities will be scheduled, workspace needs coordinated, site access requirements identified, and counterparts identified prior to the onsite review. The team lead may also request copies of the DOE site office's issues management procedures that define the categorization of assessment results (e.g., findings, weaknesses, observations).
- Onsite activities will normally begin with a formal onsite entrance meeting and conclude with a formal exit meeting. However, in some cases, these meetings will be conducted using alternate methods (e.g., telephone bridge calls or televideo conferences). These meetings will be coordinated with the other review officials, if required. In all cases, meeting participants must include management representatives from the organization(s) on which the activity will focus.
- The entrance meeting agenda will include the team lead's presentation of team plans; team introductions; identification of needed tours, work observations, walk-downs, interviews, and work space arrangements; and the exit meeting schedule.

The team lead will introduce team members (if present), discuss requirements for obtaining documentation and reviewing team notes (where document classification review is necessary), and summarize the background and status of the team's area of focus. For shadow reviews, the team leader will ensure that interface protocols are clearly articulated that ensure effective data gathering and communications while precluding interference with the site team's activities. The team lead will also confirm the schedule for the exit meeting.

- At the exit meeting, the team lead will present an outline of activities conducted, discussion of preliminary results, solicitation of comments, discussion of needed clarifications and/or corrections of observations, identification of corrective actions already taken or in progress, and identification of information source(s) that should be consulted to validate observations, as well as the process and schedule for factual accuracy review and resolution. For concurrent reviews, the exit meeting will be coordinated with other review officials.

- The team lead will periodically brief the HSS Site Lead or designee, the DOE site office POC, and the site contractor's POC on mutually agreed schedules or as needed. These communications will typically address progress in implementing the plan or charter, results achieved, difficulties encountered, and significant changes being made in planned activities. For concurrent reviews, site briefings will be coordinated with other review officials.
- The results of the small team oversight activity will be documented in an Independent Oversight Review Report issued by the Director, Office of Enforcement and Oversight to the DOE site office manager. The report development process will ensure that the DOE site office and site contractor are provided an opportunity to verify the factual accuracy of the report and all team members review the report and the Director, Office of Enforcement and Oversight approves the report. The report will document the activity introduction, scope, background, results, conclusions, findings, opportunities for improvement, unresolved items, and items for follow-up (see Appendix B for the Independent Oversight Review Report format). Findings resulting from small team oversight activities may be categorized consistent with the DOE site office issues management procedures. Findings will be reviewed against the generic tailored approach specified in the *Office of Safety and Emergency Management Evaluations Appraisal Process Guide* and against specific suggestions (if any are provided) for follow-up specified in the Independent Oversight Review Report. Where deficiencies are identified and placed into line management issues management processes prior to issue of the report, information to support follow-up (e.g., non-conformance report number) will be included in the report.
- A draft of the Independent Oversight Review Report will be provided to the Director, Office of Safety and Emergency Management Evaluations for review before being forwarded to the DOE POC to initiate the factual accuracy review. The Director, Office of Safety and Emergency Management Evaluations will arrange for an appropriate technical and management review of the draft Independent Oversight Review Report, typically using a Quality Review Board (QRB).
- After resolution of the technical and management review comments, a copy of the draft Independent Oversight Review Report will be provided to the DOE line management POC to facilitate the factual accuracy review.
- Upon resolution of the DOE line management factual accuracy comments (if any), the Independent Oversight Review Report is finalized.
- A copy of the final Independent Oversight Review Report will be provided to the associated DOE line organization as an attachment to a transmittal memorandum from the Director, Office of Enforcement and Oversight. The line management organization is responsible for evaluating, addressing, and following-up on the results in accordance with the DOE line organization issues management procedures and DOE Order 227.1, *Independent Oversight Program*.
- The Office of Safety and Emergency Management Evaluations will retain the documents supporting the accuracy of the Independent Oversight Review Report in accordance with the Office of Enforcement and Oversight Appraisal Process Protocols.

Operational Awareness Activities

- Operational awareness activities involving site visits are typically conducted to obtain insights into site operations and activities, to follow up on site issues, to tour facilities, or to attend key meetings.
- Opportunities for site operational awareness activities are identified by HSS Site Leads.
- The Director, Office of Safety and Emergency Management Evaluations will approve site visits for operational awareness activities.
- Operational awareness activities will be documented in a concise Independent Activity Report that documents the activity's purpose and background and briefly summarizes the tasks performed, observations, results, and conclusions. When appropriate, the report will also provide a critical evaluation to document HSS efforts to maintain operational awareness of site activities and to provide feedback to the site for lessons learned (see Appendix A for the Independent Activity Report Form).
- Independent Activity Reports are validated with site contacts and approved by the Director, Office of Safety and Emergency Management Evaluations before it is posted on the HSS website.

4.0 RESPONSIBILITIES

Principal Deputy Chief for Mission Support Operations

- Chairs Quality Review Boards

Director, Office of Enforcement and Oversight

- Approves plans for independent oversight reviews.
- Approves the Independent Oversight Review Report transmittal memorandum and Independent Oversight Review Report for delivery to the responsible DOE/National Nuclear Security Administration manager (typically, the site office manager or designee).
- When differences regarding schedules of activities or the resolution of issues arise, work with line management to resolve them. When differences cannot be resolved, the issues need to be raised to the Chief, Health, Safety and Security Officer for resolution.

Director, Office of Safety and Emergency Management Evaluations

- Prioritizes resources for small team oversight or mission support activities.
- Approves CRADs
- Assigns appropriate Office of Safety and Emergency Management Evaluations technical staff to perform HSS small team oversight.

- Ensures that team members possess qualifications, competencies, and experience commensurate with their assignments and are free of any potential conflict of interest.
- Coordinates with the Principal Deputy Chief for Mission Support Operations for scheduling and conduct of QRBs.
- Reviews, concurs in, and releases the draft Independent Oversight Review Report for transmittal to the DOE site office POC to initiate the DOE site office and site contractor factual accuracy review, where applicable.
- Determines and, if necessary, communicates the need for an Independent Oversight Review Report or Independent Activity Report from the technical personnel assigned to activities planned and led by DOE site or program offices.
- When differences regarding schedules of activities or the resolution of issues arise, works with line management to resolve. When differences cannot be resolved raises them to the Director of Enforcement and Oversight.

HSS Site Lead or Designee

- Coordinates with the site or program office POC to facilitate the development of the site-specific charter/review plan for small team oversight that includes assigned Office of Safety and Emergency Management Evaluations technical staff.
- Coordinates with the DOE site office POC to provide assigned technical staff with the site and program security information and security limitations on use of personal electronic equipment, requirements for site computers and LAN access, safety and security training, and PPE, as well as available background information pertinent to the planned small team oversight or mission support activity and site access and security information.
- Coordinates resolution of HSS, QRB, DOE site office, and site contractor comments and recommendations on the draft Independent Oversight Review Report.
- When items requiring follow-up are identified, monitors DOE site final resolution and disposition of Independent Oversight Review Report results.

HSS Small Team Lead

- Acquires and disseminates background information pertinent to the planned activity to assigned team members in support of planning that is consistent with operational and schedule constraints.
- Ensures that site and program security requirements regarding the use of personal electronic equipment, computers and LAN access, safety and security training, and PPE pertinent to the planned activity are identified and communicated to team members. Protection requirements for classified information and CUI associated with the activity will also be identified and communicated to team members.
- Leads the onsite entrance and exit meetings for the activity.

- Provides periodic status briefings to the Director, Office of Safety and Emergency Management Evaluations, HSS Site Lead or designee, the DOE site office sponsor, and the site contractor POC.
- Develops the Independent Oversight Review Report, including consolidation of input from other involved team members and resolution of comments and recommendations resulting from the factual accuracy validation.
- Participates in the QRB and resolves QRB comments.
- Drafts the Director, Office of Safety and Emergency Management Evaluations memorandum for transmittal of the Independent Oversight Review Report.
- When differences regarding issue resolution arise, raise to the Director, Office of Safety and Emergency Management Evaluations.

HSS Technical Team Members

- Review the provided background information, consistent with operational and schedule constraints, to plan onsite activities and identify additional information needed for the effective performance of assigned activities.
- Prepare for and meet site and program security limitations on use of personal electronic equipment, site computer equipment and LAN access, training, and PPE, with a goal of minimizing the negative impact on the time available to perform assigned activities.
- Protect classified information and CUI, as required.
- Provide required input for developing the report on the overall results of the team's activities.
- Recommend initial categorization of results consistent with the DOE site office issues management procedures.
- Support resolution of HSS, DOE site or program office, and site contractor's comments and recommendations, including those resulting from the factual accuracy review.
- Provide requested follow-up support, as necessary.

5.0 REFERENCES

- DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*
- DOE Order 414.1D, *Quality Assurance*
- DOE Order 227.1, *Independent Oversight Program*
- *Office of Independent Oversight Appraisal Process Protocols*, dated July 2009
- *Office of Safety and Emergency Management Evaluations Appraisal Process Guide*, dated July 29, 2009.

6.0 APPENDICES

- A. HSS Independent Activity Report Form
- B. HSS-Led Small Team Activity Independent Oversight Review Report Format
- C. Types of Reviews

APPENDIX A HSS Independent Activity Report Form

HSS Independent Activity Report - Rev. 0		Report ID: HIAR- XXXX-####-##-##-##														
Site: 	Subject: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="border: 1px solid black; padding: 2px; font-size: 8px;">Enter the full name of the site where the activity took place.</div> <div style="border: 1px solid black; padding: 2px; font-size: 8px;">Provide a brief phrase to capture the subject of the activity to fit in this field.</div> </div>															
Dates of Activity: 		Report Preparer: 														
Activity Description/Purpose: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="border: 1px solid black; padding: 2px; font-size: 8px;">Enter the dates in the following format: XX/XX/XXXX - XX/XX/XXXX</div> <div style="border: 1px solid black; padding: 2px; font-size: 8px;">Concisely discuss the purpose of the activity and generally characterize what was done.</div> </div>																
Result: <div style="border: 1px solid black; padding: 5px; margin-top: 10px; font-size: 8px;">Provide the full name of all HSS participants involved in the activity; be sure to show the Team Lead first. Consider including the office code for each member to provide additional clarity.</div>																
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">HSS Participants</th> <th style="text-align: left;">References</th> </tr> </thead> <tbody> <tr><td>1 (lead)</td><td>1</td></tr> <tr><td>2</td><td>2</td></tr> <tr><td>3</td><td>3</td></tr> <tr><td>4</td><td>4</td></tr> <tr><td>5</td><td>5</td></tr> <tr><td>6</td><td>6</td></tr> </tbody> </table>	HSS Participants	References	1 (lead)	1	2	2	3	3	4	4	5	5	6	6	<div style="border: 1px solid black; padding: 2px; font-size: 8px;">Concisely discuss the outcome of the activity that was described in the field above.</div> <div style="border: 1px solid black; padding: 2px; font-size: 8px; margin-top: 10px;">List each reference document, if applicable, that was used to perform the given activity.</div>	
HSS Participants	References															
1 (lead)	1															
2	2															
3	3															
4	4															
5	5															
6	6															
Were there any items for HSS follow up? Yes <input checked="" type="radio"/> No <input type="radio"/>																
HSS Follow Up Items <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">1</div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">2</div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">3</div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">4</div>																

Use a consistent 3 to 4 letter code to identify the site (e.g., HRL = Hanford Richland Operations Office; HORP = Hanford Office of River Protection; INL = Idaho National Laboratory), followed by the 4-digit year, 2-digit month, & 2-digit day on which the activity ended. Finally, include a sequential 2-digit identifier (i.e., 01, 02, 03, etc.) to enable an allowance for more than one review ending on the same day at the same site; separate all by a hyphen.

Enter the full name of the person who is providing the detailed information for input into the report.

Concisely discuss the outcome of the activity that was described in the field above.

List each reference document, if applicable, that was used to perform the given activity.

Identify whether or not there were any items that were identified during the activity that will need additional attention after the conclusion of the activity.

Follow Up Items are intended to be matters that were identified during the activity that, when addressed by HSS, will serve the purpose, add value to the result, and/or enhance the effectiveness of the given activity (e.g., plan a future visit, coordinate with a counterpart, obtain a facility document, etc.) These items are not generally issues, concerns, or findings that would need to be tracked.

APPENDIX B
Independent Oversight Review Report Format for HSS-Led Small Team Activity

**Independent Oversight Review
Title**

COVER

Include a cover sheet with the heading stating Independent Oversight Review of “title of the review,” then DOE logo in the center of the page, the month and year date of the report below the logo, and a bottom heading stating Office of Safety and Emergency Management Evaluations, Office of Enforcement and Oversight, Office of Health, Safety and Security, U.S. Department of Energy.

TABLE OF CONTENTS

If the report is considered complicated or of significant length, include a table of contents.

ACRONYMS

Include a listing of acronyms as applicable to the details provided in the report.

PURPOSE

Briefly describe the purpose of the review activity.

SCOPE

Briefly describe the scope of the review activity with adequate detail to envelope the activity. Include references to the applicable criteria, review, and approach documents or other plan utilized to establish review criteria.

BACKGROUND

Provide a brief overview of the facility or activity, including mission, hazards, and other information pertinent to the review.

METHODOLOGY

Include reference to the plan, criteria, review and approach documents, and other information with regard to the conduct of the review important to convey to the reader.

RESULTS

Describe the outcomes of the review, including positive attributes and areas where review criteria were or were not met. The information may be presented in narrative form or aligned with criteria as appropriate.

Include information regarding actions taken during the review to address deficient conditions.

Acknowledge areas where the results confirm known deficiencies and, when appropriate, discuss ongoing or planned actions.

CONCLUSIONS

Include a summary overview of the results.

FINDINGS, UNRESOLVED ITEMS AND ITEMS FOR FOLLOW-UP

Identify findings or other deficiencies consistent with DOE Order 227.1, *Independent Oversight Program* and, when appropriate, indicate whether these have been entered into line management corrective action systems. This section may also include unresolved items (questions that could not be resolved during the review) which may be bundled for detailed questions associated with a review of technical documents if the details are provided in Appendices.

List actions that are planned to follow up on identified deficiencies or other planned actions (e.g., reviewing a revised procedure when issued).

OPPORTUNITIES FOR IMPROVEMENT

List opportunities for improvement as suggestions offered by the Independent Oversight review team that may assist line management in identifying options and potential solutions to various issues identified during the conduct of the review. Opportunities for improvement are not mandatory, and they do not require formal resolution by management through the corrective action process.

APPENDICES

Appendix A – May be used to list the team members and management participants/reviewers.

Additional appendices may be used to provide additional relevant information such as documents reviewed and/or additional technical details to support the results. For technical reviews these may include detailed unresolved items that may result from reviews of technical documents. Appendices may also be used to list the documents reviewed and/or activities conducted.

APPENDIX C

Types of Small Team Oversight Activities

Targeted Reviews: This is an established program of reviews across the DOE complex that is selected by Office of Enforcement and Oversight management based on input from the HSS Nuclear Safety Coordinating Committee that considers complex-wide information. Topics for targeted reviews are identified in memorandum and are systematically and formally planned, executed, and reported according to a documented assessment plan. Targeted reviews are conducted at multiple sites across the DOE complex, using one or more HSS personnel participating on reviews for consistency, and may include a separate summary report documenting complex-wide results in addition to the individual Independent Oversight Review Reports for each activity.

Limited Scope Appraisals: These are formal assessments that are identified in approved HSS schedules and are systematically and formally planned, executed, and reported according to a documented assessment plan. There are two different methods commonly used for accomplishing assessments: compliance and performance-based. Compliance assessments focus on verifying compliance with requirements through the implementation of procedures, and begin with a determination of the contractual and regulatory requirements governing the assessed organization. Performance-based assessments focus first on the adequacy of the process that produced a product or service, and then on the product itself. If problems are found in the product or work processes, the assessor evaluates the methods and procedures used to implement the applicable requirements in an effort to find the failure that led to the problems. In performance-based assessments, emphasis is placed on getting the full story on a problem before coming to a conclusion.

Concurrent Reviews: These are either targeted reviews or limited scope appraisals conducted concurrently with Site Office or Contractor assessment activities. HSS concurrent reviews typically include additional areas of focus to supplement the site assessments and cover any gaps identified by HSS, the Site Office or the Contractor; e.g., additional criteria related to the line management oversight activity may be included such as follow-up on findings or other concerns.

Shadowing: This is a specific type of oversight activity where HSS personnel observe an assessment and document an evaluation of the effectiveness of the Site Office or Contractor assessment. It also allows the shadowing personnel to independently obtain field-level information that may not be obtained otherwise. Shadow assessments are characterized by a structured and documented review of the observed assessment practices and effectiveness for the assigned area of focus. Shadow assessments do not utilize the same level of formal planning required for targeted reviews or limited scope appraisals, but do include more rigorous documentation of expectations than routine operational awareness activities. As applicable, shadowing should observe the team as it investigates each of the three primary legs of an assessment: people (interviews), paper (plans/procedures), and processes (work in progress). HSS personnel should avoid participating directly in the assessment process, but are expected to provide feedback as appropriate.