

**DOE-STD-1063-2017, Facility Representatives  
Frequently Asked Questions**

**Q1: Who is responsible for determining the appropriate level of Facility Representative (FR) coverage per Section 5.1 of DOE-STD-1063-2017, Facility Representatives?**

A: The lead sentence in DOE-STD-1063-2017, Section 5.1 states: “Field Element Managers, or their designee, shall evaluate each hazardous facility to determine an appropriate level of FR coverage.” The Field Element Manager (FEM) may delegate some of the activities related to determining the appropriate level of FR coverage, but the FEM retains ultimate responsibility for this determination.

DOE Order (O) 422.1, *Conduct of Operations*, Change 3 (10-4-2019) invokes DOE-STD-1063-2017 as a required method. DOE O 422.1 also establishes the top-level requirements and responsibilities for the FR program.

DOE O 422.1, Section 4.b, provides the top-level requirement. It states: “DOE line management must provide appropriate oversight of conduct of operations. Field organizations must assign DOE facility representatives to oversee conduct of operations in accordance with DOE-STD-1063-2017, *Facility Representatives*.”

DOE O 422.1, Section 5.d.(4), provides the top-level responsibility to the Head of the Field Element. It states: “Assign DOE facility representatives to oversee conduct of operations in accordance with DOE-STD-1063-2017, *Facility Representatives*.”

Both the Standard and the Order are clear in that the responsibility for determining the appropriate level of FR coverage is with the FEM, also known as the Head of Field Element.

**Q2: How are determinations of the appropriate level of FR coverage made? Does judgment play a role in making these determinations?**

A: DOE-STD-1063-2017, *Facility Representatives*, Section 5.1 of states, “Appendix C provides a detailed process to determine appropriate facility coverage and assignment and is the methodology to be used.”

Appendix C provides a structured, analytical approach to making these determinations, based on the number of facilities, the facility hazard categorizations, the facility activity level, and the FR coverage level. However, Step 6 of this required method makes it clear that the FEM is allowed to use judgment to adjust the result of the base coverage. It states:

“Following establishment of the Base FR FTE Level for each facility, the FEM may further adjust the level of coverage. This adjustment should take into consideration factors such as those listed below and be based on the FEM’s judgment of the contractor’s operational performance and the priority for providing FR oversight. FR coverage for “Other Hazardous Facilities” with a “Low” hazard category is optional.

- Complexity of the facility and facility operations and facility operations involving multiple shifts
- Status of operational rigor; history of Contractor performance for similar activities
- History of significant events/incidents at the facility

- Facility size, age, and material condition
- Programmatic importance and risk associated with successful accomplishment of mission
- Potential for DOE or public interest
- Anticipated changes in the operational status of facility
- Facility configuration changes (like test facilities, for example)
- Availability of other DOE technical oversight

Determine the Adjusted FTE Coverage Level and list in Column F.”

This step in the staffing analysis provides flexibility in the adjustment of coverage and contains no requirements (i.e., “shall” statements), but does include consideration factors that the adjustment should take into consideration.

These factors allow the FEM to use judgment to consider other relevant factors, particularly the contractor’s experience and past performance. A contractor that consistently performs excellent work should require less Federal oversight of operations. The FEM is not required to document the basis for adjustments but considers this to be good practice.