

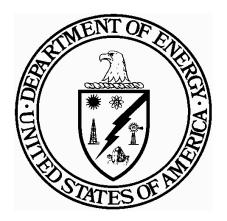
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DOE-STD-1063-2006 April 2006

Superseding DOE-STD-1063-2000 March 2000

DOE STANDARD

FACILITY REPRESENTATIVES



U.S. Department of Energy Washington, D.C. 20585 **AREA MGMT**

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FOREWORD

- 1. This Department of Energy standard is approved for use by all DOE Components.
- 2. The revision to this DOE standard was developed by a working group consisting of headquarters and field participants. Beneficial comments (recommendations, additions, deletions) and any pertinent data that may improve this document should be sent to:

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Additional information on the DOE Facility Representative Program is available on the DOE Facility Representative web site at <u>http://www.facrep.org/</u>. Comments regarding this standard or the DOE Facility Representative Program can be submitted electronically from the web site.

- 3. DOE technical standards, such as this standard, do not establish requirements. However, all or part of the provisions in a DOE standard can become requirements if they are explicitly stated to be requirements in a DOE requirements document, or the organization makes a commitment to meet a standard in a contract or in an implementation plan or program plan required by a DOE requirements document.
- 4. Throughout this standard, the word "shall" is used to denote actions that must be performed if the objectives of this standard are to be met. If the provisions in this standard are made requirements through one of the two ways discussed above, then the "shall" statements would become requirements. It is not appropriate to consider that any "should" statements would automatically be converted to "shall" statements, as this action would violate the consensus process used to approve this standard.

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CONTENTS

	PAG	GΕ
1.		1
1.1	Scope	1
1.2	Purpose of Program	1
1.3	Purpose of Standard	
1.4	Applicability	
1.4		1
2.	REFERENCES	2
2.1		
2.1	Government Documents	
	2.1.1 DOE Directives (Polices, Orders, Manuals, Guides)	
	2.1.2 DOE Standards	
2.2	Order of Precedence	1
•		_
3.	DEFINITIONS)
_		
4.	DUTIES, RESPONSIBILITIES, AND AUTHORITIES OF FACILITY REPRESENTATIVES AND OTHER KEY PERSONNEL	Э
4.1	Duties, Responsibilities, and Authorities of Facility Representatives	Э
	4.1.1 Operational Awareness)
	4.1.2 Communication	
	4.1.3 Availability	
	4.1.4 Independence	
	4.1.5 Scope of Reviews10	
	4.1.6 Routine Activities	
	4.1.7 Stop Work Authority	
	4.1.8 Relationship of Facility Representative with DOE Managers11	
	4.1.9 Relationship of Facility Representatives with Other DOE	4
	Oversight Personnel	I
	4.1.10 Relationship of Facility Representatives with Operating Contractor	1
4.2	Duties, Responsibilities, and Authorities of Other Key Personnel	
4.2		
	4.2.1 Deputy Secretary	
	 4.2.2 Facility Representative Program Manager	
	4.2.4 Field Element Managers	
	4.2.4 Field Element Managers	
	4.2.5 Taomy Representative Program Sponsors	,

_				
5.		ITY REPRESENTATIVE PROGRAM REQUIREMENTS		
5.1		Coverage and Staffing		
5.2		Assessment Plans and Reports		
5.3	Unenc	umbered Access	.18	
5.4	Training			
	5.4.1	Needs Analysis	.19	
	5.4.2	Formal Training	.19	
	5.4.3	On-the-Job Training		
	5.4.4	Continuing Training	.19	
5.5	Qualification			
	5.5.1	Qualification Card	.20	
	5.5.2	Core Qualification		
	5.5.3	Interim Qualification		
	5.5.4	Full Qualification		
	5.5.5 5.5.6	Qualification on Additional Facilities After Full Qualification		
	5.5.6 5.5.7	Requalification Proficiency		
	5.5.8	Examinations		
5.6		nated Facility Representative		
5.7	-	tment, Selection, Retention, and Advancement Considerations		
•	5.7.1	Recruitment and Selection		
	5.7.2	Retention and Advancement		
5.8	Facility	Representative Program Performance Assessment		
	and Fe	edback	.27	
	5.8.1	Performance Indicators		
	5.8.2	Field Element Self-Assessments		
	5.8.3	Peer Reviews		
	5.8.4 5.8.5	Annual Facility Representative Workshop Communication and Feedback Mechanisms		
- 0				
5.9	Differir	ng Professional Opinions	.29	
TABL	c			
		ility Representative Qualification	25	
	1 1 00		.20	
APPE	NDICE	S		

Appendix A	Facility Representative Performance Indicators	\-1
Appendix B	Facility Representative Program Assessment Guide E	3-1
Appendix C	Process to Determine Facility Representative Staffing	C-1
Appendix D	Continuing Training Guidance)-1

1. SCOPE

- 1.1 <u>Scope</u>. This standard, DOE-STD-1063-2006, FACILITY REPRESENTATIVES, defines the duties, responsibilities and qualifications for DOE Facility Representatives, based on facility hazard classification; risks to workers, the public, and the environment; and the operational activity level. This standard provides the guidance necessary to ensure that DOE's hazardous nuclear and non-nuclear facilities have sufficient staffing of technically-qualified Facility Representatives to provide day-to-day oversight of contractor operations. Field Element Managers should incorporate the information contained in this standard, as well as any additional facility-specific requirements, such as radiological training, into site-specific implementation procedures for DOE Facility Representatives.
- 1.2 <u>Purpose of Program</u>. The purpose of the DOE Facility Representative Program is to ensure that competent DOE staff personnel are assigned to oversee the day-to-day contractor operations at DOE's hazardous nuclear and non-nuclear facilities. Oversight performed by Facility Representatives provides DOE line managers with accurate objective information on the effectiveness of contractor work performance and practices, including implementation of the integrated safety management system. The Department's experience has shown that when personnel are dedicated to this function, the information that they provide can be used proactively to ensure that work is completed in a safe and efficient manner.
- 1.3 <u>Purpose of Standard</u>. The purpose of this standard is to help ensure that DOE Facility Representatives are selected based on consistently high standards and from the best qualified candidates available, that they receive the training required for them to function effectively, and that their expected duties, responsibilities, and authorities are well understood and accurately documented. To this end, this guidance provides the following practical information:
 - a. The duties, responsibilities and authorities expected of a Facility Representative, and other personnel relative to the Facility Representative Program.
 - b. An approach for use in determining the required facility coverage.
 - c. The training and qualifications expected of a Facility Representative.
 - d. Elements necessary for successful Facility Representative Programs at DOE Field Offices.
- 1.4 <u>Applicability</u>. This standard is intended for use by all DOE Components in establishing and maintaining Facility Representative programs at DOE-

owned, contractor-operated facilities. DOE Managers of governmentowned, government-operated facilities may apply this guidance to facilities operated exclusively by DOE Federal employees. Field Element Managers and Secretarial Officers may develop additional guidance regarding Facility Representative requirements.

2. REFERENCES

- 2.1 <u>Government Documents</u>. The following are references to the extent specified herein.
 - 2.1.1 DOE Directives (Policies, Orders, Manuals, Guides).
 - DOE O 151.1B, Comprehensive Emergency Management System
 - DOE P 226.1, Department of Energy Oversight Policy
 - DOE O 226.1, Implementation of Department of Energy Oversight
 Policy
 - DOE M 226.1, Department of Energy Oversight Manual (draft)
 - DOE O 231.1A, Environment, Safety and Health Reporting
 - DOE M 231.1-2, Occurrence Reporting and Processing of Operations Information
 - DOE O 360.1B, Federal Employee Training
 - DOE M 360.1-1B, Federal Employee Training Manual
 - DOE M 411.1-1C, Safety Management Functions, Responsibilities, and Authorities Manual [including the functions, responsibilities and authorities documents specific to program offices and field elements]
 - DOE O 414.1C, Quality Assurance
 - DOE O 420.1A, Facility Safety
 - DOE O 425.1C, Startup and Restart of Nuclear Facilities
 - DOE P 426.1, Federal Technical Capability Policy for Defense Nuclear Facilities
 - DOE M 426.1-1A, Federal Technical Capability Manual
 - DOE O 430.1B, Real Property Asset Management
 - DOE O 440.1A, Worker Protection Management for DOE Federal and Contractor Employees
 - DOE O 442.1A, Department of Energy Employee Concerns Program
 - DOE G 450.4-1B, Integrated Safety Management System Guide
 - DOE P 450.7, Environment, Safety and Health (ESH) Goals
 - DOE O 5480.19, Conduct of Operations Requirements for DOE Facilities

2.1.2 DOE Standards.

- DOE-HDBK-1080-97, Guide to Good Practices for Oral Examinations
- DOE-HDBK-1204-97, Guide to Good Practices for the Development of Test Items
- DOE-HDBK-1205-97, Guide to Good Practices for the Design, Development, and Implementation of Examinations
- DOE-STD-1027-92, Hazard Classification and Accident Analysis Techniques for Compliance with DOE O 5480.23, Nuclear Safety Analysis Reports

- DOE-HDBK-1118-99, Guide to Good Practices for Continuing Training
- DOE-STD-1146-2001, DOE General Technical Base Qualification Standard
- DOE-STD-1151-2002, Facility Representative Functional Area Qualification Standard
- DOE-STD-3006-2000, Planning and Conduct of Operational Readiness Reviews
- DOE-STD-3009-94, Preparation Guide for U.S. DOE Nonreactor Nuclear Facility Safety Analysis Reports

2.1.3 <u>Other</u>.

- 10 Code of Federal Regulations (CFR) Part 820, Procedural Rules for DOE Nuclear Activities
- 10 Code of Federal Regulations (CFR) Part 830, Nuclear Safety Management
- 10 Code of Federal Regulations (CFR) Part 850, Chronic Beryllium Disease Prevention
- 10 Code of Federal Regulations (CFR) Part 851, Worker Safety and Health Program
- DOE Implementation Plan for DNFSB Recommendation 92-2, DOE's Facility Representative Program at Defense Nuclear Facilities, November 5, 1992
- DOE Implementation Plan for DNFSB Recommendation 93-3, Improving DOE Technical Capability in Defense Nuclear Facilities Programs, May 5, 1998
- Principles for a Strong Nuclear Safety Culture. Institute of Nuclear Power Operations, November 2004
- Effective Engineering Work Management, INPO 04-002. Institute of Nuclear Power Operations, December 2004
- Guidelines for Effective Nuclear Supervisor Performance, INPO 04-003. November 2004
- 2.2 <u>Order of Precedence</u>. In the event of conflict between the text of this document and DOE Order, the DOE Order takes precedence. Nothing in this document supersedes applicable laws and regulations.

3. DEFINITIONS

For the purpose of this standard, the following terms are defined:

<u>Activity Level</u>. The frequency of handling or moving hazardous material, or the frequency of activities involving one or more hazards creating an opportunity for the occurrence of a reportable event (see Appendix C, PROCESS TO DETERMINE FACILITY REPRESENTATIVE STAFFING, for activity level determination).

<u>Cognizant Secretarial Officer</u>. (DOE M 411.1-1C) The Secretarial Officers responsible for accomplishing work in a safe and environmentally sound manner at DOE-owned or DOE-leased sites and facilities (other than Headquarters). Cognizant Secretarial Officers (CSOs) are Secretarial Officers with line accountability for a laboratory or a bounded set of facilities. The CSOs provide direction to line organizations in DOE HQ and the field regarding safety management processes and systems. Although the ultimate responsibility for safety rests with the Secretary, the CSOs are responsible for providing direction to the line organizations in their assigned areas and they are accountable for the appropriate and successful implementation of DOE policies and requirements through their line organizations.

<u>Core Qualification</u>. The portion of the qualification program designed to cover the DOE-wide, generic subjects on which all Facility Representatives are expected to be knowledgeable. This includes the DOE General Technical Base Qualification Standard (DOE-STD-1146-2001) and the DOE Facility Representative Functional Area Qualification Standard (DOE-STD-1151-2002).

<u>Contractor</u>. Any person under contract with the Department of Energy, or under sub-contract with a DOE contractor, with the responsibility to perform activities in connection with any facility, laboratory, or program at a DOE-owned or leased facility.

Department or DOE. The Department of Energy.

<u>DOE Oversight</u>. (DOE O 226.1) Encompasses activities performed by DOE organizations to determine whether Federal and contractor programs and management systems, including assurance and oversight systems, are performing effectively and/or complying with DOE requirements. Oversight programs include operational awareness activities, onsite reviews, assessments, self-assessments, performance evaluations, and other activities that involve evaluation of contractor organizations and Federal organizations that manage or operate DOE sites, facilities, or operations.

<u>Documented Safety Analysis</u>. (10 CFR 830.204) Documented safety analysis means a documented analysis of the extent to which a nuclear facility can be operated safely with respect to workers, the public, and the environment,

including a description of the conditions, safe boundaries, and hazard controls that provide the basis for ensuring safety.

<u>Facility</u>. (DOE O 430.1B) Land, buildings, and other structures, their functional systems and equipment, and other fixed systems and equipment installed therein, including site development features outside the plant, such as landscaping, roads, walks, parking areas, outside lighting and communication systems, central utility plants, utilities supply and distribution systems, and other physical plant features.

<u>Facility Representative</u>. For each major facility or group of lesser facilities, an individual assigned responsibility by the Field Element Manager (or designee) for monitoring the safety performance of the facility and its operations. This individual is the primary point of contact with the contractor for operational and safety oversight and is responsible to the facility's DOE Line Manager.

<u>Facility Representative Coverage</u>. The degree of attention a Facility Representative is expected to devote to an assigned facility. Coverage is usually expressed in terms of the amount of time, including back shift and weekend time, that the Facility Representative is expected to routinely spend observing operations in the facility.

<u>Field Element or Organization</u>. A non-Headquarters DOE organization that is geographically distinct. Field elements can be site offices, support offices, operations offices, field offices, regional offices, or offices located at environmental restoration, construction, or termination sites.

<u>Field Element Manager</u>. The DOE employee having overall responsibility for a field element.

<u>Hazard</u>. (10CFR830.3) Hazard means a source of danger (i.e., material, energy source, or operation) with the potential to cause illness, injury, or death to personnel or damage to a facility or to the environment (without regard to the likelihood or credibility of accident scenarios or consequence mitigation).

<u>Hazard Categories</u>. The consequences of unmitigated releases of radioactive material are evaluated as required by 10CFR830, *Nuclear Safety Management*, and classified by the following Hazard Categories:

Category 1 – The hazard analysis shows the potential for significant offsite consequences.

Category 2 – The hazard analysis shows the potential for significant onsite consequences.

Category 3 – The hazard analysis shows the potential for only significant localized consequences.

Below Category 3 – Only consequences less than those that provide a basis for categorization as a hazard category 1, 2, or 3 nuclear facility.

DOE-STD-1027-92 contains additional information on methods and criteria for determination of Hazard Categories.

<u>Hazard Classes</u>. (DOE-STD-3006-2000) Non-nuclear facilities are categorized as high, moderate, or low hazards based on the following:

High – hazards with a potential for onsite and offsite impacts to large numbers of persons or for major impacts to the environment; Moderate – hazards which present considerable potential onsite impacts to people or the environment, but at most only minor offsite impacts, and; Low – hazards which present minor onsite and negligible offsite impacts to people and the environment.

<u>Hazardous Material</u>. (DOE-STD-3009-94) Any solid, liquid, or gaseous material that is toxic, explosive, flammable, corrosive, or otherwise physically or biologically threatening to health. Candidate hazards include radioactive materials, hazardous chemicals as defined by OSHA in 29 CFR 1910.1200 and 29 CFR 1910.1450; any material assigned a reportable quantity value in 40 CFR 302, Table 302.4; threshold planning quantities in 40 CFR 355 Appendix A; threshold planning quantities in 29 CFR 1910.119; level of concern quantities in EPA's "Technical Guidance for Hazard Analysis—Emergency Planning for Extremely Hazardous Substances"; or materials rated as 3 or 4 in National Fire Protection Association 704 "Identification of the Fire Hazards of Materials." (Another definition of hazardous material in 49 CFR 172 applies to hazardous material that is to be transported in commerce.)

<u>Headquarters Program Manager</u>. A Headquarters organization, reporting to the Cognizant Secretarial Officer, responsible for executing program management functions, and for directing and supporting field elements in safety and health, administrative, management, and technical areas.

<u>Interim Qualification</u>. Specific requirements that must be met prior to a Facility Representative being assigned to provide limited coverage in a facility for which he or she is not fully qualified.

Line Organization. The unbroken chain of command that extends from the Secretary through the Deputy Secretary (Chief Operating Officer), to the Secretarial Officers who set program policy and plans and develop assigned programs, to the Program and Field Element Managers who are responsible for execution of these programs, and to the contractors who conduct the programs. Environment, Safety, and Health (ES&H) are integral parts of each program. Accordingly, responsibility for ES&H functions resides with the line organizations.

<u>Occurrence Report</u>. (DOE M 231.1-2) A documented evaluation of an event or condition that is prepared in sufficient detail to enable the reader to assess its significance, consequences, or implications and to evaluate the actions being proposed or employed to correct the condition or to avoid recurrence.

<u>Operational Awareness</u>. (DOE O 226.1) Routine day-to-day monitoring of work performance through facility tours/walk-throughs, work observation, document reviews, meeting attendance and participation, and ongoing interaction with contractor workers, support staff, and management.

<u>Proficiency</u>. The level to which a qualified Facility Representative stays current on technical knowledge, assigned facilities, procedures, etc. Regaining proficiency may be required by field element programs and procedures after an absence from Facility Representative duties, a period of inactivity at a given facility, as an ongoing training, or based on length of time between the Facility Representative's full qualification and next requalification date.

<u>Qualification</u>. The process of completing requirements determined to be vital to performing the Facility Representative role in a given facility. This process includes acknowledgment of the required education and experience, completion of the core knowledge requirements to perform Facility Representative duties, facility-specific requirements determined by the field element, and oral and written examinations.

<u>Qualifying Official</u>. An individual, designated by the Field Element Manager, or designee, authorized to sign the qualification card after verifying the candidate possesses the appropriate level of knowledge or skills for such signature.

<u>Risk</u>. (DOE-STD-3009-94) The quantitative or qualitative expression of possible loss that considers both the probability that an event will occur and the consequences of that event.

<u>Secretarial Officer</u>. (DOE M 411.1-1C) A manager who reports directly to the Secretary, the Deputy Secretary or the Under Secretaries.

<u>Training Equivalency</u>. The completion of training requirements by an individual through the means of prior experience or training, which results in comparable knowledge or capabilities, equivalent to that which would be gained by complying with the specified requirements. Prior experience and training is evaluated and documented to demonstrate equivalency to the specified requirements.

<u>Training Program</u>. A planned, organized sequence of activities designed to prepare persons to perform their jobs, to meet a specific position or classification need, and to maintain or improve their performance on the job.

<u>Walkthrough</u>. Also referred to as a "walkdown." A tour through a facility with a qualifying official for the purpose of verifying a Facility Representative candidate's knowledge of the facility. Also, a tour through a facility to maintain operational awareness of the facility.

4. DUTIES, RESPONSIBILITIES, AND AUTHORITIES OF FACILITY REPRESENTATIVES AND OTHER KEY PERSONNEL

- 4.1 <u>Duties, Responsibilities, and Authorities of Facility Representatives</u>. The following paragraphs describe the duties, responsibilities, and authorities normally expected of Facility Representatives. Field Element Managers should tailor these and additional duties and responsibilities for Facility Representatives to reflect the specific requirements of the site, the facility, the operational activities, and the involved organizations.
 - 4.1.1 Operational Awareness. A Facility Representative shall be thoroughly familiar with site and facility characteristics, operating procedures, facility authorization bases, operating organizational structure, and key process control personnel. The Facility Representative shall be aware of major work in progress and in planning. The Facility Representative shall know which personnel are controlling the work, what procedures are to be used, whether training and gualification requirements have been established and are being met. Facility Representatives shall verify that work activities are being performed safely based on periodic observations and spot-check reviews of frequency commensurate with the hazard and difficulty of the work. This knowledge is primarily acquired by walking through the facility, observation of work in progress, review of facility records and documentation, and attendance at appropriate management meetings of the operating contractor. Facility Representatives should spend a significant amount of their time in their assigned facilities observing operations and assessing operating conditions, consistent with the goals in Appendix A, FACILITY REPRESENTATIVE PERFORMANCE INDICATORS. Field Element Managers shall ensure that operating contractors apprise Facility Representatives of planning, scheduling, maintenance, operations review, and safety review meetings.
 - 4.1.2 <u>Communication</u>. The Facility Representative shall maintain frequent communication with field element supervision. The Facility Representative shall ensure that DOE line management is cognizant of current facility conditions.
 - 4.1.3 <u>Availability</u>. The Facility Representative shall be available to respond to facility events and serve as the DOE presence for special operations. The Facility Representative shall be readily available to operating contractor personnel to facilitate the notification, if required, and reporting of occurrences and any safety or operational concerns.
 - 4.1.4 <u>Independence</u>. A Facility Representative should be in a position to provide information to DOE line management independent of programmatic responsibilities. Therefore, Field Element Managers

should not make Facility Representatives responsible for preparing budgets or schedules for assigned facilities. In cases where it is impractical to separate programmatic responsibilities, the Field Element Manager or designee should approve all assignments of programmatic responsibilities to Facility Representatives.

- 4.1.5 Scope of Reviews. The Facility Representative shall observe, evaluate, and report on the effectiveness of the operating contractor in multiple areas important to safe, efficient operations, such as operational performance, quality assurance, management controls, emergency response readiness activities, and assurance of worker health and safety. In facilities where nuclear safeguards and security are a concern, Facility Representatives may evaluate security issues as they relate to safe operations. Additionally, the Facility Representative should evaluate the overall effectiveness of the operating contractor in implementing corrective actions to deficiencies identified by facility reviews, including corrective actions which stem from identifying, reporting, and tracking nuclear safety noncompliance under the Price-Anderson Amendments Act of 1988. The frequent presence of a Facility Representative in the facility is intended and expected to improve communications between DOE and the operating contractor. This improved communications is intended and expected to lead to a better understanding of DOE expectations by the contractor, and aid in the implementation of enhancements to facility work practices and operating conditions.
- 4.1.6 <u>Routine Activities</u>. Facility Representatives should vary their day-today presence in assigned facilities to show a degree of unpredictability and spontaneity based on the Facility Representative's judgment regarding what is appropriate to observe and assess. While there can be beneficial oversight achieved by walking through assigned facilities with contractor facility managers, certain benefits are lost when Facility Representative presence is 100% predictable and always with facility managers.
- 4.1.7 <u>Stop Work Authority</u>. The Facility Representative is assigned to monitor the performance of facility operations and management. The Facility Representative is a direct safety oversight extension of DOE line management to each respective facility. The responsible Field Element Manager shall define clearly the authority provided to each Facility Representative. The Field Element Manager shall ensure that Facility Representatives have the authority to "Stop Work" in the facility. The Field Element Manager shall ensure that contractors and subcontractors are aware that Facility Representatives have this authority and that this authority covers all facility-related work performed by the contractor and subcontractor. The Facility

Representative shall "Stop Work" in the following instances, as a minimum:

- a. Conditions exist that pose an imminent danger¹ to the health and safety of workers or the public.
- b. Conditions exist, that if allowed to continue, could adversely affect the safe operation of, or could cause serious damage to, the facility.
- c. Conditions exist, that if allowed to continue, could result in the release, from the facility to the environment, of radiological or chemical effluents that exceed regulatory limits.
- 4.1.8 Relationship of Facility Representative with DOE Managers. Facility Representatives should periodically meet with line/program managers within the field element and senior line managers within the field element to provide information related to the assigned facilities. If safety or operational concerns are not resolved to the satisfaction of the Facility Representative, the Facility Representative should elevate the concerns through the defined DOE management hierarchy until an adequate resolution is obtained (see also Section 5.9). It is highly desirable that each Facility Representative only be assigned facilities under a single line/program manager within the field element and under a single Cognizant Secretarial Officer. This might not be practical at multi-program facilities, or when more than one facility is involved.
- 4.1.9 <u>Relationship of Facility Representative with Other DOE Oversight</u> <u>Personnel</u>. Descriptions of Senior Technical Safety Managers and Safety System Oversight and their relationships to Facility Representatives can be found in DOE M 426.1-1A, Federal Technical Capability Manual.
- 4.1.10 Relationship of Facility Representative with Operating Contractor. Facility Representatives occupy a unique position in the transmission of information between DOE and its contractors. Facility Representatives should be able to communicate effectively with all levels of the contractor organization. They should be familiar with the contractor chain of command for facility operations. The Facility Representative should always strive to work constructively and effectively with contractor personnel to meet the shared goals of safe and efficient facility operations, in accordance with relevant DOE and contractual expectations. Facility Representatives should represent DOE to the contractor and ensure the contractor carries out DOE

¹ Any condition or practice such that a hazard exists that could reasonably be expected to cause death or serious physical harm to employees (permanent or prolonged impairment of the body or temporary disablement or requiring hospitalization), unless immediate actions are taken to mitigate the effects of the hazard and/or remove employees from the hazard.

operational safety policies in a manner consistent with DOE Program Office and Field Element expectations, relevant contract requirements, and the contractor's Integrated Safety Management System description. In defining the relationship between a Facility Representative and contractor, the following points are emphasized:

- a. The Facility Representative functions as a part of DOE line management, and therefore should exercise authority consistent with specific program and management guidance established by the field element.
- b. The Facility Representative is the primary point of contact for the contractor to notify DOE of reportable occurrences as prescribed in DOE M 231.1-2.
- c. The contractor is responsible for the safe and efficient operation of the facility. The contractor is accountable to DOE to perform its operations in a manner that ensures the safety and health of personnel and protection of the environment. No Facility Representative activity or inactivity can diminish the contractor's responsibility.
- d. The Facility Representative is responsible for determining that the contractor is operating the facility in a safe and efficient manner, consistent with the established safety expectations and requirements. Facility Representatives fulfill this responsibility by assessing the contractor's performance and discussing identified deficiencies and corrective action with contractor management. Field Element Managers should identify processes or procedures within the field element for Facility Representatives to use to track identified issues or discrepancies to satisfactory closure.
- e. Although the Facility Representative identifies deficiencies, the ultimate responsibility for identifying and correcting deficiencies rests with the operating contractor. Field Element Managers should ensure that the contractor does not rely solely on the Facility Representative to identify or correct deficiencies.
- f. Minor events or problems are frequently clues that indicate more general problems in the contractor's organization, management, personnel abilities, or practices. Therefore, attention to detail in the identification and correction of minor problems can result in significant improvements in the contractor's performance. When corrective actions are called for, DOE line/program managers should initiate formal action with the operating contractor. Additionally, the Facility Representative should also provide input to formal mechanisms such as confirmation of actions or orders, if necessary.
- g. The Facility Representative shall adhere to certain rules of conduct, or protocol, while performing assigned duties, including the facility's approved conduct of operations procedures. Formal protocols should be established to include the following:

- 1. Facility Representatives should avoid interrupting operators in their work. The Facility Representative should wait for opportune times to deal with facility operators. If the Facility Representative is observing operations or activities, the Facility Representative should perform observations unobtrusively. Operators carry the true burden of safety, and a diversion from their duties could adversely affect plant operations.
- 2. The Facility Representative should maintain frequent contact with facility management. When Facility Representatives observe something that raises a safety concern, they should discuss their concerns with the facility management. If the contractor response is deemed unsatisfactory, the Facility Representative should discuss the concern with DOE line management for appropriate action.
- 3. Facility Representatives should use established chains of command for all requests for action, except when exercising "Stop Work" authority.
- 4. Facility Representatives shall keep a record of their activities and observations. Facility Representatives should periodically review their records to determine if a systemic or recurring problem exists with contractor activities at one or more facilities. This record is subject to review in audits or appraisals and may be used by the Field Element Manager as a source of information for the contractor evaluation process.
- 4.2 <u>Duties, Responsibilities, and Authorities of Other Key Personnel</u>. Duties, responsibilities, and authorities of other key personnel with respect to the Facility Representative program are described below and in DOE M 231.1-2, Occurrence Reporting and Processing of Operations Information, DOE O 5480.19, Conduct of Operations for DOE Facilities, and DOE M 411.1-1C, DOE Safety Management Functions, Responsibilities, and Authorities Manual, and associated lower-tier functions and responsibilities documents.

4.2.1 <u>Deputy Secretary</u>.

- a. Establish DOE policy on Facility Representatives.
- b. Resolve any cross-organizational disputes regarding Facility Representatives.
- c. Ensure the Facility Representative Program Manager and Cognizant Secretarial Officers take actions necessary to consistently meet program goals.

- 4.2.2 Facility Representative Program Manager.
 - a. Guide DOE-wide program implementation and continuous improvement.
 - b. Monitor DOE-wide implementation performance and disseminate information to senior DOE and NNSA managers to promote improved performance.
 - c. Sponsor an annual workshop to share lessons learned and promote continued effectiveness of the Facility Representative program.
 - d. Participate in periodic assessments of site Facility Representative programs.

4.2.3 Cognizant Secretarial Officers.

- a. Designate a representative to assist in fulfilling these responsibilities.
- b. Review overall effectiveness of Facility Representative programs at assigned field elements, including performance indicator information and accomplishment of program self-assessments and associated corrective actions.
- c. Ensure adequate allocation and use of resources for Facility Representative programs at assigned field elements.
- d. Monitor and validate the number of Facility Representative positions filled with qualified personnel to ensure that adequate Facility Representative coverage is provided.
- e. Provide developmental opportunities for Facility Representatives.

4.2.4 Field Element Managers.

- a. Determine facility coverage needs and make assignments of qualified Facility Representatives to maintain day-to-day oversight of applicable facilities, using Appendix C, PROCESS TO DETERMINE FACILITY REPRESENTATIVE STAFFING.
- b. Select, train, and qualify Facility Representatives so that they are capable of performing their assigned duties.
- c. Clearly define the functions, responsibilities and authorities of the Facility Representatives, and ensure that affected DOE and contractor managers understand the role of the Facility Representatives and provide the necessary access and support.
- d. Establish a formal protocol for Facility Representatives to follow while performing their duties.
- e. Periodically evaluate the effectiveness of the field element's Facility Representative program and pursue changes to improve overall performance and effectiveness, using Appendix A, FACILITY REPRESENTATIVE PERFORMANCE INDICATORS, and Appendix B, FACILITY REPRESENTATIVE PROGRAM ASSESSMENT GUIDE.

- f. Provide developmental opportunities for Facility Representatives. Examples of such opportunities could be short-duration details to other organizations or specialized training.
- g. Assign a Facility Representative Program Sponsor from among the field element's senior managers to guide and direct implementation within the field element.
- h. Establish the authority of the Facility Representative to represent line management to the contractor regarding operational safety issues, except where this would change scope, cost, or schedule.
- i. Interact frequently with Facility Representatives and take appropriate action to resolve identified safety and management issues.

4.2.5 Facility Representative Program Sponsors.

- a. Serve as a management advocate for Facility Representatives within the field element to resolve programmatic issues.
- b. Guide and direct Facility Representative program implementation within the field element.
- c. Ensure that Facility Representatives are effectively contributing to the field element, and DOE line/program managers are effectively using their contributions.
- d. May appoint or secure the appointment of a Facility Representative Program Manager to manage day-to-day implementation issues for the field element and participate in Facility Representative Steering Committee discussions.

5. FACILITY REPRESENTATIVE PROGRAM REQUIREMENTS

- 5.1 <u>Facility Coverage and Staffing</u>. Field Element Managers shall evaluate each hazardous facility to determine an appropriate level of Facility Representative coverage. Appendix C, PROCESS TO DETERMINE FACILITY REPRESENTATIVE STAFFING, provides a detailed process to determine appropriate facility coverage and assignment and is the expected methodology to be used. The Field Element Manager, or designee, should prepare staffing plans to document these assignments and supporting rationale.
 - a. Field Element Managers shall assign one or more full-time Facility Representatives to each hazard category 1 facility, unless the Field Element Manager and Cognizant Secretarial Officer agree that less coverage is necessary. For nuclear hazard category 2 or 3 facilities, radiological facilities, and hazardous non-nuclear facilities, Field Element Managers may assign a Facility Representative to two or more facilities. In unusual situations, when it is impractical to assign a sufficient number of facilities to occupy a person full-time, the Field Element Manager may assign the duties of a Facility Representative to be performed part-time as a collateral function.
 - b. It is important that a Facility Representative's primary duty of providing DOE an on-site presence not be diminished. Field Element Managers should make assignments so that Facility Representatives spend a significant portion of their time in their assigned facility(s). It is preferable that Facility Representative offices be located within the facility of primary responsibility. Field Element Managers should make assignments so that administrative work does not prevent Facility Representatives from performing their primary function of monitoring the performance of the facility and its operations as described in Section 5.2.
 - c. To the degree that Facility Representatives are advanced or otherwise lost from the program, Field Element Managers should take necessary steps to ensure departing Facility Representatives are replaced in a timely manner. The goal of the Field Element Manager should be to recruit and hire technically capable personnel to fill Facility Representative vacancies in an expeditious manner. Recognizing the lengthy average time for a new Facility Representative candidate to achieve full qualifications (i.e., approximately 18 months), Field Element Managers should strive to recruit experienced candidates from technically rigorous programs, both from within DOE and from external sources, to minimize time in qualification. Such potential sources include DOE Safety System Oversight personnel, DOE Subject Matter Expert personnel, and personnel from directly related fields such as naval nuclear power, commercial nuclear power,

radioactive waste management, nuclear weapons, nuclear research, industrial safety, chemical safety, or accelerator facility programs. Section 5.7 contains additional guidance.

- d. As part of the overall staffing strategy, Field Element Managers should also consider making use of existing DOE and NNSA technical intern programs to provide a source of prospective Facility Representatives candidates, especially for sites that have experienced historically high attrition rates.
- e. Field Element Managers should review staffing plans and assignments of Facility Representatives at least annually to ensure that coverage assignments and responsibilities are appropriate to the hazards and level of activity involved.
- f. Field Element Managers may also establish provisions for changing coverage. For example, as the degree of hazard, complexity, or other governing factors is reduced, the Field Element Managers may increase the number of processes, facilities, buildings or areas covered by a single Facility Representative. Field Element Managers may use special coverage assignments for a facility that operates only intermittently. Also, Field Element Managers should consider periodically rotating Facility Representatives to different facilities to maintain objective oversight, to broaden Facility Representative's experience base, and to provide flexibility for backup coverage during periods when Facility Representatives are absent.
- g. Field Element Managers should make Facility Representative assignments to optimize effective interaction with the facility operating organization line management responsible for ensuring safe and efficient performance at the facility. For example, Field Element Managers may make assignments based on facility and/or operating organization subdivisions. If the contractor has established a building or facility manager concept, the Field Element Manager may assign Facility Representatives on a similar basis.
- 5.2 <u>Facility Assessment Plans and Reports</u>. Field Element Managers should develop facility assessment plans using a tailored approach to ensure that a broad-based and systematic review of all aspects of facility operations is conducted over an established period of time. Assessment plans may include DOE O 5480.19, Conduct of Operations Requirements for DOE Facilities, and associated standards, and other safety directives. These assessment plans should be consistent with the requirements in DOE O 226.1, Implementation of Department of Energy Oversight Policy. Facility assessments are not intended to conflict with or duplicate other Field Office assessment efforts nor are they intended to unduly restrict the Facility Representative's day-to-day oversight of assigned facilities.

- a. Field Element Managers, or designee, should establish reporting requirements, such as Facility Representative logs or assessment reports, for each Facility Representative position. Field Element Managers should establish guidance on the content of periodic or special reports.
- b. Field Element Managers should ensure that reporting does not become an onerous task that unduly limits the oversight activities of the Facility Representative. In order to facilitate a direct communications link with senior contractor management, the Facility Representative and DOE managers should meet with senior contractor managers on a periodic basis to report the results of Facility Representative assessments and to discuss trends and systemic issues.
- 5.3 <u>Unencumbered Access</u>. Field Element Managers shall ensure that Facility Representatives have independent and direct access to contractor personnel, facilities, and records, as necessary, to carry out their assigned responsibilities. Unencumbered and immediate access does not preclude a Facility Representative from following industrial safety, emergency action, radiation protection, safeguards and security, or operational requirements and controls of the facility. Facility Representatives shall adhere to these requirements and controls when discharging their duties.
 - a. Field Element Managers shall ensure that Facility Representatives have immediate unannounced access to every assigned facility, consistent with necessary security and safety controls. Facility Representatives shall maintain the proper clearances, training, personal protective equipment, and physical qualifications for such access.
 - b. Field Element Managers shall ensure that contractor management affords the Facility Representative the opportunity to attend meetings, training classes, operator certification boards/examinations, etc., that contribute to the execution of the duties and responsibilities of the Facility Representative.
 - c. Access to some contractor records may be limited as specified in the contract between DOE and the contractor. For example, the contract may include an item such as DEAR 970.5204-79 "Access to and Ownership of Records" which sets forth certain categories of records which may be considered to be the property of the contractor.
 - d. Due to safeguards and security requirements, Field Element Managers may require that more than one properly trained and cleared individual be present before access can be gained to some areas.

- 5.4 <u>Training</u>. Field Element Managers shall train Facility Representatives in accordance with DOE O 360.1B, Federal Employee Training with additional elements defined in this standard. Facility Representative supervisors should ensure that training materials, qualification cards, and examinations are periodically updated to reflect changing facility conditions and new or updated DOE directives.
 - 5.4.1 <u>Needs Analysis</u>. Facility Representative supervisors should ensure an analysis of the candidate's initial training needs is conducted. This is the process by which the tasks, duties, and responsibilities of the position are analyzed to identify formal or informal training, self-study, seminars, on-the-job-training, briefings, rotational assignments, or other types of training necessary for effective job performance.
 - 5.4.2 <u>Formal Training</u>. Field Element Managers should ensure that the Facility Representatives receive the training necessary for the position. Frequently, appropriate courses and training can be found within the DOE complex, other Federal agencies, or from non-government sources within the scientific community to satisfy some of the training needs. Headquarters offices, in coordination with the field elements, can develop additional training courses and material to help meet the nonfacility-specific Facility Representative training needs. Close collaboration among field elements and Headquarters line management is encouraged to minimize development costs for courses. In cases where formal course work is not practical, Field Element Managers should ensure that informal training provides Facility Representatives the required level of knowledge.
 - 5.4.3 <u>On-the-Job Training</u>. Field Element Managers should establish the "Onthe-Job Training" requirements, regarding the controls, activities, processes, and specialized procedures necessary for qualification. Practices such as mentoring of Facility Representative candidates by qualified, experienced Facility Representatives and providing ample opportunities for candidates to participate in facility operational awareness activities are encouraged.
 - 5.4.4 <u>Continuing Training</u>. Field Element Managers should establish a continuing training program to enhance and strengthen the knowledge, skills and abilities of Facility Representatives, to ensure they are aware of significant new hazards or activities they may encounter during the performance of their duties, and to provide a mechanism to share lessons learned from facilities on the site and across the complex. Guidance in Appendix D, CONTINUING TRAINING GUIDANCE, should be used.
- 5.5 <u>Qualification</u>. Field Element Managers shall qualify each Facility Representative by a combination of education, experience, and training to

carry out the duties and responsibilities of the position. Facility Representatives are required to meet stringent and comprehensive qualification standards. Field Element Managers shall qualify Facility Representatives as possessing a broad technical knowledge in a variety of disciplines and being able to demonstrate an understanding of the management, processes, practices, regulatory requirements, and operating limits of their assigned facilities. The Field Element Manager shall develop the overall qualification program, in accordance with DOE M 426.1-1A, Federal Technical Capability Manual, and DOE M 3601.1-1B, Federal Employee Training Manual, including training elements specific to the assigned facilities and systems. Field Element Managers shall define and document the qualifications, and authority of personnel involved in the training of Facility Representatives. The steps involved in the various levels of qualifications are described below and in Table 1 – Facility Representative Qualification.

- 5.5.1 Qualification Card. Field Element Managers should establish a Facility Representative qualification card ("qual card") or equivalent for each major facility or group of lesser facilities for which they are responsible. The gual card contains a list of all of the training elements or learning objectives, a corresponding standard detailing the required level of knowledge for each objective, and provisions for signatures to attest to satisfactory completion of each objective to the appropriate level of knowledge. If training equivalencies are used, Field Element Manager should provide justification for each equivalency based on DOE M 426.1-1A. Justification includes appropriate support documentation such as transcripts or certificates of completion. Field Element Managers shall maintain a copy of the approved equivalency in the Facility Representative's qualification record. Additionally, the Field Element Manager should designate gualifying officials who are authorized to sign the qual card after verifying the candidate possesses the appropriate level of knowledge for each requirement. The qual card should include the following:
 - a. <u>Self Study</u>. Site and facility-related DOE Directives and Standards, Federal and State safety and environmental protection regulations applicable to the assigned site and facility, the facility safety documentation, and all site and facility-specific documents and procedures that are pertinent to the responsibilities of the Facility Representative.
 - b. <u>Formal Training</u>. Formal training, both on-site and off, necessary for the Facility Representative to function effectively. The training may be presented by DOE, contractors, other Federal Agencies, or private firms.

- c. <u>On-the-Job Training</u>. Knowledge of facility processes, systems requirements, and specialized procedures required to be demonstrated to a qualifying official.
- d. <u>Facility Walkthroughs</u>. A walkthrough of the assigned facilities, in the presence of a qualifying official, for the purpose of demonstrating practical skills and thorough knowledge of selected key elements or systems of the facility.
- 5.5.2 <u>Core Qualification</u>. Core qualification requirements are the DOE General Technical Base Qualification Standard (DOE-STD-1146-2001) and the DOE Facility Representative Functional Area Qualification Standard (DOE-STD-1151-2002). It is acceptable to have one qual card that covers both Core and site/facility-specific requirements.
- 5.5.3 Interim Qualification. DOE Field Element Managers shall establish and document the process and the specific requirements to be met prior to a Facility Representative candidate being assigned to provide interim coverage in a facility for which he or she is not fully qualified. Field Element Managers shall formally define and document the duties and authorities that may be assigned to an Interim Qualified Facility Representative. Field Element Managers should minimize the time spent as a Facility Representative under Interim Qualification. The Field Element Managers should also determine the compensatory measures to be implemented during interim periods while no fully qualified Facility Representative is assigned to a given facility.
- 5.5.4 <u>Full Qualification</u>. Full qualification occurs upon completion of Core Qualification, site/facility-specific competencies designed to meet the needs of the individual facility, a facility walkthrough, a written exam, and an oral board. Designated facility line managers within the field element should review and confirm satisfactory completion of the training and qualification requirements and eligibility of the candidate to become a Facility Representative. Qualification is granted by the Field Element Manager or designee.
- 5.5.5 <u>Qualification on Additional Facilities After Full Qualification</u>. Upon assignment of Facility Representatives to a different or additional facility or site, Field Element Managers or their designees should identify any additional qualification requirements that are necessary for a Facility Representative to complete for that facility or site. As a minimum, the additional qualification requirements should consist of the qual card for the new facility, a walkthrough, and a written and/or oral exam.
- 5.5.6 <u>Requalification</u>. Facility Representatives shall requalify every three years. The Field Element Manager shall establish processes or procedures to ensure the three year time limit for requalification is not

exceeded. The Field Element Manager, or designee, may extend the three-year period up to six months for extenuating circumstances. The purpose of triennial qualification is to ensure the incumbent Facility Representative maintains the knowledge and skills necessary to properly perform Facility Representative duties at the assigned facilities. At the time of requalification the Facility Representative will be currently fully qualified and meet proficiency requirements at the assigned facility or facilities, and exhibit satisfactory performance as is documented by the past three performance appraisals. DOE Field Element Managers shall document the requalification process, which shall as a minimum include the following:

- a. Items added to the Facility Representative Qualification Cards since the individual's last qualification or requalification, including General Technical Base, Facility Representative Functional Area Qualification Standard, and applicable Site Specific Qualification Standards.
- b. Determination by the Facility Representative's supervisor what system, process, and facility documentation changes have occurred since qualification (or the last requalification) that are to be included for examination.
- c. Determination by the Facility Representative's supervisor, based on demonstrated performance, any areas of theory or fundamentals, if any, which should be included for examination.
- d. A written examination and/or oral checkout covering the material included for requalification examination.
- e. Certification of requalification is granted by the DOE Field Element Manager or designee.
- 5.5.7 <u>Proficiency</u>. Field Element Managers shall formally define proficiency requirements. These requirements shall include actions required to regain proficiency following periods of inactivity as a Facility Representative, and the length of time which triggers a need for proficiency training. For example, if a Facility Representative is no longer assigned to a facility but wishes to maintain proficiency, the Facility Representative should periodically participate, either in their normal role or as observers, in in-plant drills. Qualifications to regain proficiency after inactivity as a Facility Representative are shown in Table 1 Facility Representative Qualification.
- 5.5.8 <u>Examinations</u>. The Field Element Manager, or designee, should develop formal procedures for the administration of facility walkthroughs, and

written and oral examinations. Additional information on examinations is available in DOE-HDBK-1204-97 and DOE-HDBK-1205-97.

- a. <u>Facility Walkthroughs</u>. Field Element Managers shall establish requirements for facility walkthroughs of assigned facilities at selected points in the Facility Representative qualification process for demonstrating to a qualifying official practical skills and knowledge of selected key elements, including safety systems, structures, and components of the facility.
- b. <u>Written Examinations</u>. During Full Qualification, Field Element Manager or designee shall administer a written examination to the Facility Representative candidate as listed in Table 1 – Facility Representative Qualification. The examination should include only subjects on the Facility Representative core and facility-specific qual cards. The minimum passing grade should be 80%.
- Oral Examinations. For a Facility Representative to achieve Full C. Qualification, the Field Element Manager or designee shall convene and chair a Qualification Board for the purpose of conducting an oral examination of the Facility Representative candidate. The Field Element Manager or designee shall determine the composition of the Qualification Board. Board members should ask critical questions intended to integrate identified learning objectives during qualification. Additionally, the Board members may ask follow-up questions to help the Board determine how the candidates "think on their feet." Field Element Managers or designees should develop formal guidance for the Qualification Board; this guidance includes: the standards for Qualification, the use of technical advisors by the Board, the questioning procedures or protocol, pass/fail criteria, the voting authorization and procedures, and the Board deliberation and documentation process. The Board may conduct the oral exam as a group or individually. The Board should document explicitly any questions and answers that result in an oral exam failure. Other types of oral exams (e.g., oral checkouts) may be used in Facility Representative qualification as shown in Table 1 – Facility Representative Qualification.
- d. <u>Failure of Written or Oral Examinations</u>. Field Element Managers or their designees may require Facility Representative candidates who fail a written or oral examination to go on a special study program designed to strengthen each area of weakness revealed in the examination. Field Element Managers or their designees may direct candidate reexaminations, with concentration in the identified weak areas. Field Element Managers should reassign Facility Representative candidates who repeatedly fail examinations, to a

non-Facility Representative position. In rendering a final decision on reassignment, the Field Element Manager should consider any extenuating circumstances.

- 5.6 Designated Facility Representatives. Field Element Managers may establish criteria for designating Facility Representatives. For example, to become "Designated" a Facility Representative should be core qualified (i.e., complete the DOE-STD-1146-2001, DOE General Technical Base Qualification Standard and the DOE-STD-1151-2002, DOE Facility Representative Functional Area Qualification Standard) and have at least six months experience in a Facility Representative position. The purpose of this "Designation" is to indicate unique technical proficiency for the purposes of retention based upon unique competitive level codes. Designation is not equivalent to full qualification as designation will normally occur before a Facility Representative achieves full qualification. Some Field Element Managers designate Facility Representatives at the completion of interim qualifications.
- 5.7 Recruitment, Selection, Retention, and Advancement Considerations. As qualified Facility Representatives gain experience, they become a valuable resource of DOE. Field Element Managers should take necessary steps to ensure that Facility Representative positions are career enhancing and remain desirable to Facility Representative candidates. This includes incentives to maintain gualification, and the encouragement of skills enhancement through continuing training, graduate study, and professional certifications. In addition, Field Element Managers and Cognizant Secretarial Officers should provide opportunities for Facility Representatives to develop management skills. This experience and training can make Facility Representatives with solid technical and management skills into prime candidates for positions of higher responsibility both in the field and at DOE Headquarters. Field Element Managers and Cognizant Secretarial Officers should identify these developmental experiences and training opportunities in the personnel development plans for their organizations, and in the Facility Representatives' Individual Development Plans. DOE P 426.1, Federal Technical Capability Policy for Defense Nuclear Facilities, and DOE M 426.1-1A, Federal Technical Capability Manual, provide various mechanisms that can be used to retain these valuable resources.

Table 1 – FACILITY REPRESENTATIVE QUALIFICATION

QUALIFICATION PROCESS	DOE-STD- 1146-2001, General Technical Base Qualification Standard	DOE-STD- 1151-2002, FR Functional Area Qualification Standard	Site-/Facility- Specific Competencies	Facility Evaluated Walkthrough	Exam Type	Oral Board [Note 4]
1. Core Qualification	X [Note 1]	Х	-	-	Written [Note 2]	-
2. Interim Qualification	X X [Note 1] X		And as determined by the Field Element Manager when a FR provides interim coverage in a facility for which he or she is not fully qualified.			
3. Full Qualification	Core Qualified as Noted in Row 1, <u>and</u> →		Х	Х	Written [Note 2]	х
4. Qualification on additional facilities after Full Qualification	-	-	х	х	Written and/or Oral checkout [Note 4]	-
5. Periodic Requalification [Note 3]	Items added, and areas of theory or fundamentals, if any, as determined by the Supervisor.		Changes to system, process, and facility documentation, as determined by the Supervisor.	-	Written and/or Oral checkout [Note 4]	-
6. To regain proficiency after inactivity as a FR	Any items added	Any items added	Any items added	Х	Written and/or Oral checkout [Note 4]	-

Notes:

1. Satisfactory completion of the General Technical Base Course on the DOE Online Learning Center may be used.

2. Written exams for Core Qualification and Full Qualification may be combined into a single written exam.

3. The steps in Row 5, Periodic Requalification, may be combined with steps in Rows 4 and/or 6 to meet those qualifications concurrently, if necessary.

4. Oral boards and oral checkouts are described in more detail in DOE-HDBK-1080-97, Guide to Good Practices for Oral Examinations.

- 5.7.1 <u>Recruitment and Selection</u>. Field Element Managers should develop position descriptions and vacancy announcements that reflect the requirements of this standard. Several mechanisms available to assist field elements in the recruitment of high quality candidates necessary for their program are identified in the DOE M 426.1-1A, Federal Technical Capability Manual. In order for individuals to enter a Facility Representative training and qualification program with the greatest opportunity for successful completion, Field Element Managers should select candidates based on the following selection criteria.
 - a. <u>Education Requirements</u>. Educational requirements are necessary to ensure that the individuals possess the baseline knowledge to successfully complete the training program, the ability to function independently in the field, and the ability to understand scientific principles and communicate in technical terms. Field Element Managers should establish expected minimum education necessary to provide competent technical assessment of the contractor. Minimum education level is expected to be a Baccalaureate degree or equivalent technical degree. Alternately, completion of an appropriate formal training program and extensive experience in a directly related field such as naval nuclear power, commercial nuclear power, radioactive waste management, nuclear weapons, nuclear research, industrial safety, chemical safety, or accelerator facility programs is also sufficient.
 - b. <u>Experience Requirements</u>. Field Element Managers should also establish and apply facility-specific experience criteria as part of the selection criteria for Facility Representative candidates. The facility-specific experience criteria should reflect the complexity, hazard classification, and activity level of the facility and be commensurate with the responsibilities, authority and duties of the assigned position.
 - c. <u>Physical Requirements</u>. Field Element Managers should also establish and apply appropriate physical requirements. For example, most positions require moderate exertion, such as walking over uneven surfaces; climbing over equipment, machinery, ladders, and scaffolding; crouching, bending, stooping, stretching; and moving in confined spaces. Most positions also involve regular and recurring exposure to moderate risks and discomforts from use of protective clothing in elevated temperatures, close proximity to moving machinery, heavy equipment, hoisting and rigging activities; potential exposure to hazardous and radioactive materials, and exposure to normal industrial and chemical hazards. Safety and protective clothing and equipment such as respirators, safety shoes and glasses, ear protection, dosimeters, or other equipment is usually necessary.

The use of emergency protective equipment may involve significant exertion over extended periods of time. Facility Representatives need to be comfortable working in what is often an industrial environment.

- d. <u>Security Requirements</u>. Field Element Managers should also establish and apply appropriate security requirements so that the Facility Representatives have adequate security clearances to fulfill their duties.
- 5.7.2 <u>Retention and Advancement</u>. Several mechanisms are available to assist field elements in the retention of high quality personnel necessary for their program. Field Element Managers should seek to understand reasons for unusually high Facility Representative attrition rates and counter those reasons using appropriate mechanisms. These mechanisms may include:
 - a. Recognition and real-time management acknowledgement;
 - b. Access and interaction with senior DOE and Facility Managers, such as on joint-walkthroughs and feedback meetings;
 - c. Mentoring from senior DOE and Facility Managers;
 - d. Qualification bonuses;
 - e. Performance bonuses;
 - f. Requalification bonuses;
 - g. Anniversary bonuses;
 - h. Educational reimbursement incentives;
 - i. Quality Step Increases based on experience and performance;
 - j. Higher GS Grade based on higher facility hazard category;
 - k. Higher GS Grade based on scope of facility assignments;
 - I. Higher GS Grade for Facility Representative Program Managers, Supervisors, and Team Leaders; and
 - m. Promotions based on knowledge and experience.
- 5.8 <u>Facility Representative Program Performance Assessment and Feedback</u>. Field Element Managers shall periodically evaluate and adjust their Facility Representative program as necessary to ensure a high and continuously improving level of performance. Cognizant Secretarial Officers should ensure that performance assessments are accomplished, and any indicated corrective actions are completed. The DOE Headquarters Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1), should monitor the performance of Field Element Managers and Cognizant Secretarial Officers using the following methods.
 - 5.8.1 <u>Performance Indicators</u>. Carefully chosen performance indicators (PI) can provide valuable measures of the effectiveness of Facility Representative Programs. DOE-wide Performance Indicators,

addressing compliance to program requirements, improvements to safety, and performance effectiveness, are shown in Appendix A. Field elements may provide additional site-specific performance indicators. Field elements shall submit quarterly PI data to Program Offices at DOE-HQ, with a copy to the Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1). PIs for the preceding quarter are due to HQ on the first working day of February, May, August, and November. The Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1), should use these PIs to evaluate DOE-wide program effectiveness. The Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1), shall compile a Department-wide PI report for dissemination to applicable field elements and program offices.

- 5.8.2 <u>Field Element Self-Assessments</u>. Field Element Managers shall ensure that periodically (not to exceed three years) their Facility Representative Programs are evaluated relative to the requirements in Sections 4 and 5 of this standard. Field Element Managers should use evaluators who have adequate knowledge and experience to conduct meaningful reviews and provide the results of these self-assessments to the responsible Program Office at DOE-Headquarters, with a copy to the Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1). Guidance for the performance of these assessments is provided in Appendix B.
- 5.8.3 <u>Peer Reviews</u>. Field Element Managers, or designee, should invite Facility Representatives and/or Facility Representative management from other sites to perform peer reviews of their Facility Representative programs. These reviews may be accomplished as part of the periodic self-assessment described in section 5.8.2. Peer reviews can provide a mutual benefit through sharing lessons learned and can foster a more consistent Facility Representative program throughout the DOE.
- 5.8.4 <u>Annual Facility Representative Workshop</u>. The Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1), should host an Annual Facility Representative Workshop to share lessons learned about operations at hazardous DOE facilities and to share information about the Facility Representative Programs across the complex. Field Element Managers should encourage as many Facility Representatives, Facility Representative Program Sponsors, and line managers as possible to attend the workshops to share information with other sites and identify potential improvements for use in their own Facility Representative and Safety Management programs.

- 5.8.5 <u>Communication and Feedback Mechanisms</u>. The Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1), should communicate with the Cognizant Secretarial Officers and Field Element Managers frequently to guide the program implementation and continuous improvement. This can be accomplished by:
 - a. Discussions with the Program Sponsors on strategic goals and plans;
 - b. Facility Representative Steering Committee meetings; and
 - c. Information sharing through the Facility Representative Home Page (<u>http://www.facrep.org</u>).
- 5.9 Differing Professional Opinions. One of the root causes of the February 2003 Columbia Space Shuttle accident identified by the Columbia Accident Investigation Board was that organizational barriers had become established within the National Aeronautics and Space Administration that prevented effective communication of critical safety information and stifled professional differences of opinion. Because Facility Representatives have the professional obligation to inform management of safety information that may affect the health and safety of the public and/or workers. Field Element Managers should strive to develop and maintain an open atmosphere for the exchange of views of a technical nature. Facility Representatives, as well as other technical oversight personnel, should provide information to management regardless of whether it may be different from the prevailing view, disagree with a management decision or policy position, or take issue with a proposed or established practice. This information should receive an appropriate level of review for resolution of any safety issues. If necessary, Facility Representatives are encouraged to use existing procedures or follow existing guidance on resolving differing professional opinions. DOE O 442.1A, Department of Energy Employee Concerns Program, provides a process for resolving concerns that may arise. Also, the Department recently developed and promulgated draft DOE P 442.1, Differing Professional Opinions and draft DOE M 442.2-1, Differing Professional Opinions Manual for Technical Issues Involving Environment, Safety, or Health.

Appendix A

FACILITY REPRESENTATIVE PERFORMANCE INDICATORS

<u>Scope</u>: Carefully chosen Performance Indicators (PIs) can provide valuable measures of the effectiveness of Facility Representative Programs. These PIs will be used by Field Element Managers and DOE-HQ personnel to evaluate program effectiveness. Other PIs may be useful at a local level to determine the need for local program changes, depending on circumstances that may be unique to a site. DOE-wide Facility Representative PIs are relatively few in number, easy to measure and report, applicable to all Facility Representative Programs, and resistant to misinterpretation. Since effectiveness in providing contractor oversight may be difficult to capture in measurable terms, some subjective measures are used.

General Points:

- 1. The attached Performance Indicators are for DOE-wide use. Field elements may use additional, local PIs that suit their own needs.
- 2. PIs for DOE-wide use are divided into the following categories: Staffing, Training and Qualification, Facility Representative Program Accomplishments, and Fulfilling the Facility Representative Role.
- 3. Pls that measure contractor performance have been avoided as measures of Facility Representative program effectiveness.
- 4. PIs shall be reported by the Field Element Managers to program offices quarterly, with a copy sent to the Facility Representative Program Manager, Office of the Departmental Representative to the Defense Nuclear Facilities Safety Board (DOE DR-1). At the close of a given quarter, one month is allocated to assemble PI reports, which are then due on the first working day of the months of February, May, August, and November.
- 5. Performance Indicators, their methods of calculation, and goals (or targets) are presented in the following tables.

Appendix A

		STAFFING	
TYPE	INDICATOR NAME	HOW TO CALCULATE	GOAL
DOE- wide	Staffing level (%)	Number of Facility Representative positions filled	100% of [#Facility Representatives]
		Number of Facility Representative positions (per DOE-STD-1063-2006)	
		[Indicate if the authorized FTE level is different than the staffing level per DOE- STD-1063-2006]	
DOE- wide	Attrition	Number of Facility Representatives leaving the program this quarter. Provide reason for attrition using the following options: Transfer, Promotion, Lateral, Retirement, or Resignation.	N/A
		[Definitions: Transfer - Takes a Facility Representative job at different site; Promotion - Takes non-Facility Representative position at higher GS or ES level or a supervisory position; Lateral - Takes non-Facility Representative position at same GS or ES level; Retirement - Leaves DOE for retirement; Resignation - Leaves DOE other than retirement.]	

	TRAIN	IING AND QUALIFICATION					
TYPE	INDICATOR NAME	HOW TO CALCULATE	GOAL				
DOE- wide	% of Facility Representatives Core Qualified (see Section 3 Definition)	Number of Facility Representatives Core Qualified	None specified				
		Number of Facility Representatives					
DOE- wide	% of Facility Representatives Interim Qualified (if applicable; see Sections 3	Number of Facility Representatives Interim Qualified	None specified				
	and 5.5.3 for description)	Number of Facility Representatives					
DOE- wide	% of Facility Representatives Fully Qualified	Number of Fully Qualified Facility Representatives	Greater than 80%				
		Number of Facility Representatives					

Appendix A

	FACILITY REPRESE	NTATIVE PROGRAM ACCOMPLIS	HMENTS
TYPE	INDICATOR NAME	INFORMATION TO PROVIDE	GOAL
DOE- wide	Accomplishments	Any accomplishments of note during the quarter, including examples where safety and/or facility mission accomplishment is enhanced due to Facility Representative interaction, improvements in site Facility Rep programs, hiring new Facility Reps, etc.	None specified

	FULFILLING THE	FACILITY REPRESENTATIVE R	OLE
TYPE	INDICATOR NAME	HOW TO CALCULATE	GOAL
DOE- wide	Facility Representative Time Spent in the Plant/Field (Note 1) Overtime and compensation	For Facility Representatives who are at least Interim Qualified, the number of hours spent in the plant/ field this quarter (See Page A-4 Column 1)	Greater than 40%
	time hours count in both the numerator and denominator	Num ber of available work hours this quarter (Note 1)	
		[Denominator only includes number of hours expected by DOE-STD-1063-2006, if the Facility Representative is a part- time Facility Representative.]	
DOE- wide	Facility Representative Time Spent Performing Contractor Oversight (Note 1) Overtime and compensation time hours count in both	For Facility Representatives who are at least Interim Qualified, the number of hours spent performing contractor oversight this quarter (See Page A-4 Column 2)	Greater than 65%
	numerator and denominator	Number of available work hours this quarter (Note 1)	
		[Denominator only includes number of hours expected by DOE-STD-1063-2006, if the Facility Representative is a part- time Facility Representative.]	

Note 1 - Number of available work hours this quarter equals the actual number of hours a Facility Representative works in a calendar quarter, including overtime hours. It does not include leave time (sick, annual, or other) or holidays. It also does not include special assignments (e.g., source evaluation boards, accident investigations at another site, details to different offices) that are greater than one week in length and are approved by the Field Element Manager. For additional guidance on how to calculate these percentages, see page A-4.

Appendix A

Additional Guidance on Computing Facility Representative Time Spent Performance Indicators

Activities that Count as Time Spent in the Plant/Field	Activities that Count as Time Spent Performing Contractor Oversight *	Activities That Should Not Be Counted in Numerator
COLUMN 1	COLUMN 2	COLUMN 3
Goal: Greater than 40%	Goal: Greater than 65%	
Plant walkthroughs/walkdowns	Field time activities from Column 1 included	Training (mandatory refresher, Regulatory,
Surveillances	Researching requirements	continuing, facility access,
Assessments of the contractor	Occurrence report reviews	requalification, etc.)
Observing & participating in critiques	Issues tracking and trending	authorized by DOE management as being
Verifying completion of corrective actions in the field or with the contractor	Supporting facility related programmatic needs and special projects	pertinent for performing Facility Representative and Federal Employee duties.
Observing operator activities and maintenance actions	Reviewing DSAs, SERs, ABs, and other safety documentation at desk	
Reviewing contractor documents and procedures at the job site	Reviewing contractor documents and procedures at desk	Non facility-related special projects
Facility grounds and property tours	Attending facility meetings	Administrative/Collateral duties
Completing facility condition assessments	Communications involving issues requiring DOE oversight	
Commute time between facilities or	Discussions of actions required for	
driving tours within facility	addressing issues	
Attending contractor pre-job briefings or other facility activity briefings	Commute time between oversight activities	
Plan of the day/Plan of the week	Briefing Management on facility issues	
meetings		
Shift turnovers	Providing feedback to the contractor	
Response to facility/lab events	PAAA corrective action validations	
Observing or participating in facility	Preparing reports for activities in Column	
drills or lab exercises	1	
Emergency Operations Center		
assignments		
Performing facility review activities		
(e.g., ISMS verification, ORR, RA) in a facility at the Facility Rep's site		
In a raciilty at the Facility Rep's site		l

* Includes all activities under Time Spent in Plant/Field in addition to this column. Field office personnel should exercise judgment as to whether portions of a particular activity should be counted under Time Spent in the Plant/Field or Time Spent Performing Contractor Oversight. For example, if PAAA corrective action validation occurs in the facility, it should be counted as Time Spent in the Plant/Field.

Appendix A

EXAMPLE REPORT - RED RUN Site

Performance Indicators for First Quarter CY2006

(January 2006 through March 2006)

Submitted April 30, 2006

		STAFFING	
TYPE *	INDICATOR NAME	INDICATOR VALUE	DOE GOAL
DOE-wide	Staffing level (%)	90% [9 of 10]	100%
DOE-wide	Attrition	1 - Promotion	N/A

	TRAINI	NG AND QUALIFICATION	
TYPE	INDICATOR NAME	INDICATOR VALUE	DOE GOAL
DOE-wide	% of Facility Representatives Core Qualified	100% [9 of 9]	None specified
DOE-wide	% of Facility Representatives Interim Qualified	100% [9 of 9]	None specified
DOE-wide	% of Facility Representatives Fully Qualified	78% [7 of 9]	Greater than 80%

	FACILITY REPRESE	ENTATIVE PROGRAM ACCOMPLISHMENTS	
TYPE	INDICATOR NAME	INFORMATION	DOE GOAL
DOE-wide	Accomplishments	 Facility Representatives at the nuclear fuel facility recognized the potential for a high airborne radioactivity condition being caused by leak-by of a contaminated system pressure relief valve. Air samples conducted as a result of the Facility Representatives' questions confirmed a high airborne condition. A Facility Representative observed a worker who was working approximately 21 feet above a concrete slab without using fall protection equipment. The worker immediately began using the safety equipment and the safety manager briefed workers on the incident. 	None specified

	FULFILLING THE	FACILITY REPRESENTATIVE R	OLE
TYPE	INDICATOR NAME	INDICATOR VALUE	GOAL
DOE-wide	Facility Representative Time Spent in the Plant/Field	55%	Greater than 40%
DOE-wide	Facility Representative Time Spent Performing Contractor Oversight	70%	Greater than 65%

* All samples in this table are DOE-wide indicators. Field elements may provide additional site-specific performance indicators.

Appendix B

FACILITY REPRESENTATIVE PROGRAM ASSESSMENT GUIDE

The Department of Energy has implemented its Facility Representative Program, and is looking to continuously improve the program's effectiveness DOE-wide. An effective Facility Representative Program has many elements, as described in this Standard. These elements are intended to yield a program that provides DOE facilities with well-trained Facility Representatives, who spend appropriate amounts of time in their facilities, and can work effectively with their contractor management counterparts. The program, to be effective, needs the functional support of management. To maintain the continued support of DOE management, the Facility Representative program needs to demonstrate its continued performance and effectiveness, which is to be assessed periodically using this guide. Any assessment of a Facility Representative Program should determine the extent to which the objectives below are being met, and provide recommendations on improving the program's effectiveness. Assessment criteria, review and approach documents (CRADs) for the Facility Representative Program are contained in DOE M 226.1 (draft). The Assessment Lines of Question in this appendix support those CRADs.

Objectives:

- 1) Well-trained, qualified Facility Representatives.
- 2) Adequate coverage for DOE facilities.
- 3) Facility Representatives provide effective oversight of facilities.
- 4) Adequate functional support from the Field Element Management.
- 5) Performance assessment and feedback program in place.

Purpose:

The purpose of this guide is to provide the Department with a consistent set of guidelines to assess the effectiveness of Facility Representative Programs.

Scope:

This guide is provided for use by DOE HQ and Field Elements to assess the effectiveness of their Facility Representative Programs as described in DOE STD-1063-2006.

References:

The following references should be used in conjunction with this guide:

- General Technical Base Qualification Standard, DOE-STD-1146-2001
- Facility Representative Functional Area Qualification Standard, DOE-STD-1151-2002

Appendix B

- Applicable Field Element site-, and facility-specific qualification standards
- Applicable Field Element site-, and facility-specific program implementing documents
- Applicable Field Element Facility Representative Program Performance
 Indicators

I. ASSESSMENT LINES OF QUESTION

The following Lines of Question examine the strength and maturity of the Field Element's Facility Representative Program and the effectiveness of its Facility Representatives by assessing performance at meeting the five objectives of the Facility Representative Program. The Lines of Questions are based on program requirements (i.e., "shall" statements), recommended practices (i.e., "should" statements), and suggested practices (i.e., "may" statements). Not all Lines of Questions are based on "shall" requirements and may not apply to all Facility Representative programs.

- 1. <u>Well-trained, qualified Facility Representatives</u>.
- Do training records show that Facility Representatives, who are listed as qualified, have the proper education and experience, and that they have completed all qualification requirements as specified in General Technical Base Qualification Standard (DOE-STD-1146-2001), Facility Representative Functional Area Qualification Standard (DOE-STD-1151-2002), and local directives? [Sections 5.4 and 5.5]
- Do Field Element Managers qualify Facility Representatives? [Section 5.5]
- Do the training records show that Facility Representatives complete all requalification requirements at the periodicity specified in the program directive? [Section 5.5.6]
- Are the qualifying officials involved in the qualification of Facility Representatives formally identified? [Sections 5.5.1 and 5.5.8]
- Is the process used to ensure that qualified Facility Representatives maintain or regain proficiency formally defined and effective? [Section 5.5.7]
- If Facility Representatives have failed to qualify or requalify within the time allowed, what actions were taken by the responsible Field Element Manager? [Section 5.5.8.d]
- Does the examination process challenge the candidate sufficiently to verify the proper level of knowledge of all qualification areas and facilities? Do they test the Facility Representative's technical understanding of facility processes, judgment and decision-making abilities, and ability to communicate expectations to the contractor? [Section 5.5.8]
- How well does the Facility Representative understand his/her roles and responsibilities under the Field Element's Facility Representative Program? [Section 4.1]

Appendix B

 How well does Facility Representative continuing training provide hazard related and activity related information to Facility Representatives? [Appendix D]

2. Adequate coverage for DOE facilities.

- Is the Facility Representative staffing analysis performed in accordance with this standard and are Facility Representatives staffed to the indicated leve? [Sections 5.1 and Appendix C]
- Are sufficient numbers of Facility Representative candidates undergoing qualification to fill known or projected Facility Representative vacancies? If not, what is being done to correct the situation? [Section 5.1]
- How long have current Facility Representative vacancies existed? [Section 5.1]
- What is the trend of the reported time spent in the field and time performing oversight? [Section 5.8.1 and Appendix A]
- What methods are used by the Field Element Manager to ensure that adequate facility coverage is maintained by qualified Facility Representative during periods of leave? [Section 5.1]
- 3. Facility Representatives provide effective oversight of facilities.
- Has Facility Representative unencumbered access and "Stop Work" authority in their assigned facilities been adequately implemented? [Section 4.1.7]
- Has "Stop Work" authority been exercised? Was it appropriate? Was it effective? Are there occasions when it was appropriate for Facility Representatives to exercise "Stop Work" authority, but it was not used? [Section 4.1.7]
- What is the effectiveness of the Facility Representatives as verified by observing selected qualified personnel who are monitoring training, operations, or maintenance evolutions? [Section 4.1]
- Based on a sample of occurrence reports, are Facility Representative reviews of the occurrence reports accomplished in a timely manner while ensuring that the root cause has been determined and effective action proposed? [DOE M 231.1-2 Section 5.6.c]
- Do Facility Representatives accomplish facility assessments, surveillances and audits as scheduled and are the findings meaningful and consistent with facility performance? [Sections 4.1 and 5.2]
- Based on a sample of deficiencies identified by Facility Representatives during reviews, have Facility Representatives evaluated the overall effectiveness of the operating contractor in implementing corrective actions? [Sections 4.1.5 and 4.1.10]

Appendix B

- Has the Field Element Manager implemented a process to track identified issues or discrepancies to satisfactory closure? [Sections 4.1.5, 4.1.10, and 4.2.4]
- How adequate is the documentation of Facility Representative activities (e.g., reports, log keeping)? [Section 4.1.10]
- How are Facility Representative findings reported (formally and informally) to the contractor? Are the reports provided to the contractor consistent with the information recorded by the Facility Representatives? How clear is the process of reporting findings to the contractor? [Section 4.1.10]
- Does the Facility Representative have access to and communicate effectively with all levels of contractor management? [Section 4.1.10]
- Are the Facility Representative interactions with the operating contractor effective in meeting the shared goals of safe and efficient facility operations? [Section 4.1.10]
- 4. Adequate functional support from the Field Element Management.
- What are the reasons for any Facility Representative attrition? Are Facility Representative's leaving for promotions, laterals, downsizing? Have steps been taken to counter excessive attrition? [Section 5.1 and Appendix A]
- What steps has management taken to ensure that the Facility Representative positions are career enhancing? Are there senior or supervisory Facility Representative opportunities? [Section 4.2.4]
- What continuing training, professional certifications, graduate studies, or similar development activities are actively supported? [Section 5.7]
- What role does Field Element Management have in the qualification process? [Sections 4.2.4 and 5.5]
- Does management provide the resources necessary to qualify Facility Representatives within a defined schedule? [DOEM 426.1-1A Chapter III, Paragraph 4.b]
- How does line management support the actions taken by the Facility Representatives at the respective facilities? [Section 4.1.8]
- What is interface relationship between the Facility Representatives and each level of DOE line management? [Section 4.1.8]
- Do Facility Representatives periodically meet with senior line managers within the field element to provide information related to the assigned facilities? [Section 4.2.4]
- How does DOE line management track and follow up on issues raised by the Facility Representatives? [Section 4.1.10]
- What process does DOE management use to address differing professional opinions and has it been used effectively? [Section 5.9]
- What local processes exist to allow Facility Representatives access to Field Element technical expertise regarding contractor issues? [Section 4.1.9]

Appendix B

- What Performance Indicator data is used to provide indication of the Facility Representative program status? What trending and analysis is done on Performance Indicator data? How is this information used? [Section 5.8.1 and Appendix A]
- What incentive programs are in place and used effectively for the Facility Representative position? [Section 5.7.6]
- Do these programs make the Facility Representative position desirable and career enhancing? [Section 5.7.6]
- 5. <u>Performance assessment and feedback program in place</u>.
- How often does the Field Element conduct self-assessments of the entire Facility Representative program? [Section 5.8.2]
- Are peer reviews incorporated into the self-assessment process? [Section 5.8.3]
- How does the Cognizant Secretarial Officer ensure that program performance assessments are accomplished, and any indicated corrective actions are completed? Mechanisms could include providing a representative to participate in assessments. [Section 4.2.3]
- How well does the self-assessment program ensure that the evaluators have adequate knowledge and experience to conduct meaningful reviews? Based on self-assessment reports, have adequate reviews been conducted to be able to properly evaluate the assigned area of assessment and have the self-assessments generated meaningful recommendations for improvement and corrective actions? [Section 5.8.2 and Appendix B]
- Did the Field Element Manager pursue improvements to the Facility Representative program resulting from self-assessments of the program? [Sections 4.2.4 and 5.8]
- How are the Facility Representatives kept informed on changes to their facilities and their operating practices? [Section 5.4.4 and 5.5.6]
- How are lessons learned from facility events disseminated to Facility Representatives? [Section 5.5.6 and Appendix D]
- How are applicable lessons learned from facility events at other DOE facilities sought and disseminated to Facility Representatives? [Sections 5.8.4 and Appendix D]

II. APPROACH

The approach to be used in performing the Facility Representative Program assessment is expected to vary between Field Elements. In order to obtain a valuable assessment of the program, the following methodology is presented.

<u>Documentation</u>. Much information can be determined in advance of the assessment by careful review of program documentation. This can include:

Appendix B

- 1. Program directive(s) and procedure(s)
- 2. Performance Indicators (DOE-wide and locally generated)
- 3. Qualification tracking data
- 4. Significant Occurrence Reports
- 5. Performance Assessments including the Facility Representative Program Self-Assessment
- 6. Training records (including continuing training)
- 7. Qualification records
- 8. Facility Representative logs
- 9. Facility Representative reports
- 10. Management tracking system for Facility-Representative-reported issues
- 11. Written and oral examination question banks

<u>Interviews</u>. By discussing the program with its participants, a determination can be made about program performance "on paper" as opposed to "in reality." Consideration should be given to interviewing:

- 1. Facility Representative Program sponsors
- 2. Facility Representatives
- 3. Facility Representative supervisors
- 4. Line managers
- 5. Contractor facility managers
- 6. Technical Expertise support (health physics, explosive safety, etc)

<u>Walkthroughs</u>. Much information can be determined by performing walkthroughs with the Facility Representatives. Walkthroughs can provide indication of:

- 1. Level of Facility Representative qualification
- 2. Actual practices of the facility
- 3. Interactions with contractor personnel
- 4. Log-keeping and reporting practices
- 5. Corrective action verification

Other methods. The preceding list of methods is for example purposes.

Additional methods exist which may help in assessing program performance and should be used as appropriate.

III. REPORT

This section contains the report format which can be used to document these reviews of Facility Representative Programs. The report should be in narrative format and include the following:

Appendix B

Report header:

Date of report Facility Representative Program Review Field Organization Date(s) of review

Summary:

Includes a brief synopsis of the program assessment including activities observed, personnel interviewed (by position), and documents reviewed. Each section of the report should be evaluated as adequate, marginal, or unsatisfactory. An overall grade for the assessment (satisfactory or unsatisfactory) should be assigned. The report should specifically identify excellent practices worth sharing as well as significant, or key weaknesses noted. A rationale should be provided for the grade given, based on current program status, progress made, and achievement of the program objectives.

Discussion:

For each of the listed program objectives, provide a report of current status, progress made in this area, grade assigned, and recommendations for improvement.

- 1. Well-trained, qualified Facility Representatives.
- 2. Adequate coverage for DOE facilities.
- 3. Facility Representatives provide effective oversight of facilities.
- 4. Adequate functional support from the Field Element Management.
- 5. Performance assessment and feedback program in place.

Appendix C

PROCESS TO DETERMINE FACILITY REPRESENTATIVE STAFFING

<u>Overview</u>

The steps below describe an analytical process to determine Facility Representative staffing for all hazardous facilities at a site. 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. This staffing approach is also designed to provide DOE with a common human capital strategy approach such that the DOE enterprise can objectively analyze, allocate, budget, and justify Facility Representative resources and endstrength throughout the DOE Complex.

<u>Methodology</u>

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/or environment.
- 2. A method for determining Facility Representative coverage (e.g., continual, frequent, occasional, etc.) based on facility categorization and adjusted for other factors identified in DOE-STD-1063-2006 such as facility size, operations complexity, hazards and risks, etc.
- 3. A determination of Facility Representative Full Time Equivalent (FTE) requirements based on coverage assigned and adjusted to address factors considered in Step 2 above.
- 4. A determination of actual staffing based on Facility Representative FTE requirements adjusted to account for actual staff time available to support the Facility Representative function when competing activities such as collateral duties, leave, training, etc. are considered.

Procedures 8 1

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.

Appendix C

Table 1 – Facility Hazard Value

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

		Rac Exp		Cr	itic	ality	Bi	olog	gical		azaı her			Fire	,	Ele	ectri	cal	Cr	yog	gens		Hig ress	h ure			ing ging	Ex	plosi	ves	C	Othe	er	
Facility or Group of Facilities	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 Hazard Value
Facility 1	2	3	1	0	2	0	0	0	0	0	1	1	1	2	0	0	2	0	0	0	0	0	1	0	0	2	0	1	1	0	0	0	0	21
Facility 2	0	2	1	0	1	0	0	0	0	0	1	0	0	1	0	0	1	0	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	10
Facility 3	0	1	0	0	0	0	2	3	2	1	2	1	0	1	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	15

Procedure to Complete Table 1 – Facility Hazard Value

- 1. List all hazardous facilities or groups of facilities in the left column.
- 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 evaluation are as follows:
 - High Potential for onsite and offsite impacts to large numbers of persons or for major impacts to the environment.
 - Moderate Potential onsite impacts to people or the environment, but at most only minor offsite impacts.
 - Low Potential for minor onsite and negligible offsite impacts to people 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.

Appendix C

Table 2 - Determination of Facility Coverage Priority Ranking

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

Facility or Group of Facilities	Facility Hazard Value (From Table 1)	Facility Size	Material Condition	Operations Complexity	Programmatic Importance	Operational Rigor	Coverage Priority Ranking*		
а	b	С	d	е	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 – 1.00 – 1.25 –	
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 -	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.
		Between .75 and 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 AB/TSR violations. Contractor integrated management systems not mature.

Appendix C

Table 3 - Determination of Facility Representative Coverage

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

						Explanatio	on of Difference	Hiring ac progress to	
						Total F	Rs Onboard		2.0
* Facility Representative coverage is optional for non-nuclear facilities with a Coverage Priority Ranking below 15.				Total	2.25		3.08		
Facility 3	11	Biosafety Level 3	Medium	Intermittent (0.25 – 0.50)	0.25	0.25	0.25	0.73	0.34
Facility 2	13	Nuclear Haz Cat 3	High	Intermittent (0.25 – 0.50)	0.50	0.50	0.50	0.73	0.68
Facility 1	33	Nuclear Haz Cat 2	High	Frequent (0.50 – 1.00)	1.00	1.25	1.50	0.73	2.06
а	h	i	j	k	I	m	n	0	р
Facility or Groups of Facilities	Coverage Priority Ranking* (from Table 2 column h)	Facility Categoriza tion	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

Procedure to Complete Table 3 – Determination of Facility Representative Coverage

- 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. The activity level definitions are:

HIGH: Facilities that daily to weekly involve activities with one or more hazards. MEDIUM: Facilities that weekly to monthly involve activities with one or more hazards. LOW: Facilities that monthly to quarterly involve activities with one or more hazards.

- 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:
 - 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 (i.e., about 2-4 days per week). One person can cover multiple facilities. If the normally-assigned Facility Representative

Appendix C

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 I). Determine the appropriate initial FTE coverage level from the recommended FTE Level and place in column 1.
- 6. Adjusted FTE Coverage Level (column m). Multiply the FTE Coverage Level (column I) 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 be based on the FEM's judgment of the contractor's operational performance and the priority of coverage identified in column h:
 - Facility operations involving multiple shifts
 - History of contractor performance for similar activities
 - Potential for DOE or public interest
 - The risks to successful mission accomplishment
 - Financial risks
 - Complexity of the facility and facility operations
 - Hazardous work environments for workers
 - Age, maintenance condition, and level of uncertainty of the facility
 - Anticipated changes in operational status of facility
 - Number of significant accidents/incidents on site
 - Amount of other DOE technical facility oversight
 - Facility configuration changes (like test facilities, for example)
- 8. The next step is to adjust the Recommended FTE Coverage Level to account for additional duties assigned to Facility Representatives, as well as other competing activities. This can be done by using Table 5 or Table 6. Table 5 is used if sites can accurately estimate other activities for the group of Facilities Representatives at the site. Table 6 is used if Facility Representatives have different collateral duties from each other which would make using Table 5 impractical. Both Table 5 and Table 6 represent workload analyses to ensure that the Facility Representative coverage assigned is achievable given the other duties assigned to the Facility Representatives.

Appendix C

Table 4 – Recommended Facility Representative Base Coverage Levels

Chemical Hazards	Biological	Nuclear Hazard	Other Hazardous &	Facility Activity Level		
Class ¹	Hazard Level ² Categorization ³		Unique Facilities ⁴	High	Medium	Low
	Biosafety Level 4	Category 1 Hazard		Continual	Frequent	Intermittent
Facilities with regulated hazardous material requiring a Risk Management Plan AND 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:

- 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. Other Hazardous & Unique Facilities are identified by the 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.

Appendix C

Table 5 – Example 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	
Federal Holidays	10 Holidays	-80	
Special Assignments	1 week	-40	
Overtime	+208		
Available Time Adjustment	-568		
Percentage of Time Available to provide FR Co 2080)	0.73		
Staff Required to meet FR coverage required of this table (FTE Required from Table 3 / Percent	2.25/0.73 = 3.08		

* 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 Facility Representative Coverage Required (FTE) number derived in Table 3 (column n) to determine the actual number of staff required to meet the minimum coverage requirement when activities that compete with FR 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 FR duties.
- 2. Determine the average amount of time spent performing those activities across the FR Program, either as a percentage of work time or on an annual basis.
- 3. Calculate the total percentage of time available to perform FR functions.
- 4. Divide the total number in Table 3 column n 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).

Appendix C

Table 6 - Facility Representative Available Time for Coverage, Assignment Specific Analysis (Facility 1, 2, and 3 provided as examples)

Facility Coverage Groupings	Staff Assigne d Total Hours Availabl e	Collateral Duty Assignments and Estimated Time Commitments [hours/year]		Leave, Admin, Training Time [hours/year]	Effective Facility Coverage [Hours]	Effective Facility Coverage [FTE]	Recommended FTE Coverage Level	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	2.00	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

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

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 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 Level (Table 3, column n) to determine if staffing is adequate or should be modified.

Appendix C

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

Activity	Examples				
Collateral Duties	ORPS process management				
	Conduct of Operations Implementation				
	Readiness Review Process				
	Duty Officer Program Management				
Site Office Support	Integrated Project Teams				
	Special Emphasis / EEO Program Site Rep				
	NNSA Duty Officer				
	Radiological Assistance Program Team Leaders				
Special Assignments	Readiness Review Team Members at a Different Site*				
	Accident Investigation Team Members at a Different Site*				
	Special Contractor Project Partnering Team Members				
	NNSA Policy Teams				
	Contract Source Evaluation Board Support				
	Management Support Teams				
Training	Continuing Training				
	Mandatory Training				
	Qualification/Requalification Training				
	Access Training				
	Personal Development Training				
Administrative Duties	Time Keeping				
	Training Registration				
	Travel				
	Performance Indicator Tracking				
	Surveys				
	Personnel Activities				
	Document Reviews (RevCom, FRAM, internal policies)				
	E-mail management				
Leave	Annual				
	Sick				
	Military				

* Serving on Readiness Review Teams and/or Accident Investigation Teams at a site other than the Facility Representative's normal site is considered a Special Assignment for the purposes of this staffing analysis.

Examples:

- Participation on a readiness review at a site different from the Facility Representative's assigned site is considered a competing activity; however, technical support to a readiness review team or participation on a readiness review team at the Facility Representative's assigned site is not a competing activity and is considered part of the Facility Representative's assigned coverage duties.
- Evaluating Occurrence Reports for the Facility Representative's assigned facility is part of the Facility Representative's assigned coverage duties; however, managing site-wide implementation of ORPS, performing as a subject area SME, developing and evaluating site-wide performance of contract measures, process interpretations, reengineering efforts, etc. are collateral duties beyond those expected for Facility Representative facility coverage.

Appendix D

CONTINUING TRAINING GUIDANCE

The purpose of this guidance is to provide a structured approach for providing hazard- and activity-related information to Facility Representatives after completing the qualification process established by DOE. Facility Representatives should participate in the process described below so they keep abreast of new or significant changes to site-specific hazards or activities. This guidance was developed by NNSA personnel and incorporated into NNSA site procedures, and is recommended for other sites as well. Site offices may use an alternate approach provided the intent of the guidance is met. DOE-HDBK-1118-99, *Guide to Good Practices for Continuing Training*, is a useful reference for developing any continuing training procedure.

1. Identification of hazards

New or significant changes to hazards and activities that could have an impact on safety should be identified as soon as possible, preferably prior to being present in a facility, through a process established and endorsed by management. The site process should ensure that appropriate 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.
- 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
- I. Changes to occurrence reporting requirements

Appendix D

2. Analysis of hazards

New information 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. Training

Facility Representatives, Safety System Oversight or other appropriate Federal or 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. Revision

The current site-specific Facility Representative 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. Documentation

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

CONCLUDING MATERIAL

Review Activities:

Preparing Activity: DOE DR-1

Project Number:

MGMT-0005

Headquarters Offices NNSA EH ΕM MA NE RW SC Site Offices **NNSA Service Center** BHSO СН ID LASO LSO NSO OH ORO ORP PXSO RFPO RL SR SRSO SSO YSO

External Agency DNFSB