



# U.S. Department of Energy

Oak Ridge Operations

ORO O 220 Chapter VIII
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DATE: 5-31-96

**SUBJECT: ENVIRONMENT, SAFETY, HEALTH, AND QUALITY ASSESSMENT PROGRAM**

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1. PURPOSE. This Chapter establishes program guidance and administrative requirements for the Oak Ridge Operations (ORO) environment, safety, health, and quality (ESH&Q) assessment program. This Chapter:
  - a. Announces a change in philosophy away from heavy reliance on compliance assessments;
  - b. Provides interim instructions on assessments when they are conducted; and
  - c. Provides a transition toward a new system currently being developed.
2. CANCELLATION. This Chapter cancels and replaces ORIG 5482.1D, ENVIRONMENT, SAFETY, HEALTH, AND QUALITY ASSURANCE APPRAISAL PROGRAM, dated January 26, 1994; and Chapter 7 of ORIG 1300.X1A, OAK RIDGE OPERATIONS STANDARDS MANAGEMENT PROGRAM, dated July 26, 1995.
3. APPLICABILITY. The provisions of this Chapter apply to ORO Principal Staff and contractors responsible for ESH&Q where ORO has the authority to enforce contractual provisions of ESH&Q standards.
4. RESPONSIBILITIES.
  - a. Assistant Manager for Environment, Safety, and Quality (AMESQ).
    - (1) Coordinates the development and maintenance of an ESH&Q assessment program that meets applicable requirements and ORO's needs.
    - (2) Serves as ORO interface with Headquarters (HQ) Office of Environment, Safety, and Health when it performs assessments of ORO or ORO contractors.
    - (3) Coordinates ORO-wide evaluation of the assessment program for continuous improvement.
  - b. Assistant Managers.
    - (1) Ensure that the ESH&Q assessment procedures used by their organizations are consistent with the requirements of this Chapter.

(2) Upon request, provide personnel to participate in ESH&Q assessments.

c. Directors, Environmental Protection Division, Safety and Health Division, and Quality and Facility Safety Division; and Contracting Officers' Representatives (COR) (Assessor Organizations).

(1) Designate an assessment point of contact who:

- (a) Coordinates assessor organization planning with other organizations as appropriate (e.g., other ORO and HQ organizations, COR, regulatory agencies, and the assessee).
- (b) Ensures that the assessments conducted by his/her organization are scoped and categorized accurately by type so that the appropriate requirements in Attachment 2 of this Chapter can be met.
- (c) Coordinates assessment schedules developed by his/her organization with other assessor/assessee organizations.
- (d) Establishes assessment program performance measures in coordination with other points of contact.

(2) Determine the need for specific assessments and the type of assessment needed. Ensure that the assessment is planned, appropriately coordinated, and carried out to meet the requirements listed in Attachments 1 and 2 of this Chapter for that type of assessment.

(3) Assign qualified personnel to serve as team leaders, team members, and assessors.

(4) Prioritize findings according to Attachment 3 of this Chapter and include this information in the final assessment report.

(5) Submit copies of the Federal assessment reports to the assessed organization and Directives Management Group (DMG). For contractor assessments, submit a copy to the COR for transmittal to the contractor, Evaluation & Control Division (ECD), and the DMG.

(6) Review the results of the assessment program at the end of each fiscal year to determine its effectiveness. Forward conclusions and recommendations for

program improvements to the AMESQ, who will determine if changes to the program are warranted.

- d. Contracting Officers' Representatives in addition to the responsibilities listed in subparagraph 4c above:
- (1) Coordinate assessment schedules with other assessor organizations (within ORO and with outside regulators) to ensure minimum duplication and overlap.
  - (2) Ensure that contractors prepare corrective action plans as described in paragraph 5g below. Review and approve, or recommend approval of, corrective action plans for Category I and II findings in accordance with the provisions of ORIG 1300.X1A (see subparagraph 6e below). Categories of findings are described in Attachment 3 of this Chapter.
  - (3) Track completion of contractor corrective actions in accordance with the provisions of ORIG 1300.X1A (see subparagraph 6e below).
  - (4) Evaluate trends of reported noncompliances and corrective actions for their contractors.
  - (5) Maintain a list of all ESH&Q assessment reports issued for their site or program.
- e. Leader, Directives Management Group, maintains Federal assessment data in the Standards/Requirements Identification Database (STRIDe) and periodically seeks input from database users for suggestions on improving its usefulness.
- f. Assessor or Assessment Team Leader.
- (1) Conducts assessments in accordance with this Chapter.
  - (2) Prepares and distributes final assessment reports, when required, within 30 calendar days (see Attachment 2 of this Chapter).
- g. Assessed Federal Organizations.
- (1) Cooperate with assessment teams and make relevant records available.

- (2) Prepare corrective action plans in accordance with ORIG 1300.X1A (see subparagraph 6e below) for Category I and II findings.
- (3) Correct noncompliances and verify the effectiveness of the corrective actions.
- (4) Evaluate trends of reported noncompliances and corrective actions.

5. REQUIREMENTS AND PROCEDURES.

- a. Assessment Program Overview and Objectives. The goal of the ORO assessment program is the early identification of real or potential problem areas and the effective implementation of corrective actions that result in overall improvement. This Chapter describes a single approach to assessments, both of contractor and Federal activities, while allowing sufficient flexibility to meet a wide variety of assessment needs.

ORO's program for ensuring contractor compliance with requirements relies heavily on performance measures, contractor self-assessments, trending contractor findings, and day-to-day review of contractor activities by Facility Representatives and other ORO personnel. Assessments should only be performed when performance measures data shows adverse trends or when performance cannot be ascertained from objective performance measures. When performed, assessments are tied to requirements contained in approved Standards/Requirements Identification Documents (S/RID) developed using the Necessary and Sufficient (N&S) process, where available, and to performance measures, when they have been developed.

The following principles govern this program:

- (1) Establish one ORO ESH&Q assessment program that recognizes the different levels of assessments and supports the efficient conduct and documentation of each level of assessment.
- (2) Use STRIDe (or an equivalent S/RID database) to support planning, conducting, and reporting of assessments that address compliance with requirements.
- (3) Plan, coordinate, and integrate assessments to minimize duplication and impact on achieving mission and to promote efficiency.

- (4) Conduct assessments to minimize finding previously identified problems, focus on important areas, and validate that recurrence control measures are working.
  - (5) Adjust the rigor, scope, preparation, etc., of assessments and documentation to fit the need.
- b. Types of Assessments. All ORO assessments fall into one of three types defined in paragraph 7 below. Attachment 1 of this Chapter provides information for each type on scope, coverage, who conducts them, and whether they are performed independently or by the line. Further clarification is provided in Attachment 2 of this Chapter, including information on graded application of requirements for assessment planning, conduct, reporting, and follow-up.
- c. Formal Assessment Planning.
- (1) Assessment coordination is required with all applicable organizations (other ORO organizations, HQ organizations, regulatory agencies, and assessees).
  - (2) Assessor organizations send copies of assessment schedules, if developed, and assessments plans to COR, DMG, ECD, and AMESQ. Use the following criteria to determine when assessments are necessary, prepare proposed plans, and coordinate with other organizations:
    - (a) Assessments are planned, performed, and documented with appropriate input from the assessed organization and others.
    - (b) Planned assessments promote joint participation whenever possible. Organizations with independent assessment responsibilities are not excluded from participating with organizations performing internal assessments.
    - (c) ORO shall conduct assessments consistent with the importance of the facility, mission impact, trend data, previous assessment results, and the facility's performance in the particular subject area(s) being assessed.
  - (3) See Attachment 2 of this Chapter for graded information on when formal individual assessment plans are required. The level of detail contained in a plan is commensurate with the scope and size of the assessment. Minimum information includes a definition of the goal, the scope, the methodology, assessment team member(s), and the schedule. Plans must be consistent with the information and requirements contained in this Chapter, with the following exceptions:

- (a) Assessments that do not require coordination with other organizations are conducted in accordance with applicable requirements (i.e., those provided in the *ORO Facility Representatives Program Manual* [see subparagraph 6h below] and associated organizational procedures).
  - (b) When an assessor organization deviates from this Chapter, its applicable assessment plan should document the deviation(s) and include an explanation. It is recognized that deviations are necessary for assessments such as Occupational Safety and Health Act audits, which by law are to be unannounced.
- d. Assessment Team Leader.
- (1) Prepares and coordinates an assessment plan with the assessed organization for Types 1 and 2 assessments (see paragraph 7 below).
  - (2) When appropriate for the assessment type, conducts a meeting prior to the start of the assessment with the organization to be assessed to review the assessment plan and allow the organization to provide the current status of related improvement actions.
  - (3) When appropriate for the assessment type, conducts a meeting with the assessed organization after the assessment is complete to review the initial results.
  - (4) Prepares and distributes the final assessment report in accordance with the requirements of Attachment 2 of this Chapter within 30 calendar days.
- e. Conduct of Assessments. The level of effort involved in a specific assessment depends on the scope, depth, and complexity of the assessment goals and subject area and should be tailored based upon judgment and use of the criteria in Attachment 2 of this Chapter.
- (1) Goal. Identify a specific goal for the assessment during the planning process. The goal establishes the specific subject areas to be evaluated and identifies what will be accomplished by the assessment. Assessments shall not duplicate previous investigations (and their findings) and shall focus on important areas.
  - (2) Scope. The scope of the assessment establishes the facilities, documents, or operations to be evaluated and the extent of the assessment.

- (3) Methodology. The methodology establishes the assessment type to be conducted and any specific direction in accomplishing the assessment. Each assessment that determines status of performance compared to requirements in an approved S/RID (developed using the N&S process) uses STRIDe (or an equivalent database) to help tie requirements to the procedures to be assessed, and the assessment report provides the necessary data for input into STRIDe.
- (4) Scheduling. The scheduling area addresses the scheduling and coordination of the assessment.
- (5) Pre-Assessment and Post-Assessment Meetings. The assessor or assessment team leader conducts pre- and post-assessment meetings, where appropriate, with the assessed organization. These meetings may be as brief or as lengthy as required by the depth and rigor of the assessment. Results of the assessment shall be summarized at the post-assessment meeting, and a draft copy of the assessment report shall be provided to the contractor for Type 1 and Type 2 assessments. The expectations for actions in response to the assessment shall also be reviewed. Any accuracy concerns are to be identified during this meeting and resolved promptly.
- (6) Qualification of Assessors. Assessor organizations ensure that assessments are conducted by qualified personnel. All assessment personnel are trained on the ORO procedures/program.

f. Reporting, Tracking, and Trending.

(1) Reporting and Content of Assessment Reports.

Final assessment reports are due to the assessed organization within 30 days of the post-assessment meeting. The assessment report should contain:

(a) Purpose/Scope.

- 1 Why the assessment was conducted.
- 2 Nature of the assessment (i.e., interviews, observations, etc.).
- 3 What activities/facilities were assessed.
- 4 The origin of the performance criteria used (e.g., S/RIDs).
- 5 Whether it was a self-assessment or independent assessment.
- 6 List or otherwise identify the requirements assessed, if applicable.

(b) Findings.

Brief narrative statement of overall conclusions covering major noncompliances noted, major proficiencies noted, and the degree and direction of the program, its performance, and/or its compliance. Identify findings and the applicable requirement(s) to which each finding applies. Provide the category for each finding using Attachment 3 of this Chapter.

(c) Assessors.

Names and organizations (if independent assessors are part of a team with line representatives, describe to what extent the independent assessors retain their independence)

(d) Records. The formal and informal reports must be retained in accordance with DOE O 244.1 (formerly DOE 1324.5B), RECORDS MANAGEMENT PROGRAM.

(2) Corrective Actions, Approvals, Tracking, and Closure.

(a) Federal. The assessed ORO organization prepares corrective actions plans for Category I and II findings in accordance with ORIG 1300.X1A (see subparagraph 6e below), corrects Federal noncompliances, and verifies the effectiveness of the corrective actions.

(b) Contractor. For contractor assessments, the COR tracks and verifies completion of corrective actions for all Category I findings and for selected Category II findings. The COR may choose to use the contractor's tracking system or a separate system to track and document verification. Identification of corrective actions, prioritization, resource allocation, and the corrective action schedule should be based on the significance of the noncompliance and associated risk. The COR reviews and approves all significant contractor corrective actions.

(3) Trending. Assessed organizations and COR(s), if a contractor is being assessed, shall evaluate trends of reported noncompliances and corrective actions to identify areas that need focused attention to prevent further noncompliances. The COR may evaluate the contractor's trending analysis to comply with this requirement.

g. Contracting Officers' Representatives shall transmit assessment findings to the contractor with the following instructions on submission of corrective action plans:

- (1) For Category I findings, cease operations and/or take immediate corrective actions to reduce risk to acceptable levels. Prepare a report for DOE approval identifying additional corrective actions and schedules, as needed. Detail compensatory measures taken and additional corrective actions proposed.
- (2) For Category II findings, prepare a report for DOE approval identifying corrective actions and schedules in accordance with ORIG 1300.X1A (see subparagraph 6e below). The report shall be a Request for [DOE] Approval (RFA) or revised implementation plan unless otherwise specified by ORIG 1300.X1A.
- (3) For Category III findings, prepare a summary report briefly listing the corrective actions and identifying the schedules or, if applicable, refer to an existing RFA or implementation plan. Full details of the actions do not need to be identified in this report. DOE approval is not required; however, DOE may elect to review the corrective actions in more detail.
- (4) For Category IV and Proficiency findings, no contractor report is required. Contractor actions are elective.

6. REFERENCES.

- a. 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, dated May 5, 1994.
- b. DOE O 416.1 (formerly DOE 5700.6C), QUALITY ASSURANCE, dated August 21, 1991.
- c. DOE O 244.1 (formerly DOE 1324.5B), RECORDS MANAGEMENT PROGRAM, dated January 12, 1995.
- d. ORO O 410, Chapter III, QUALITY ASSURANCE, dated May 31, 1996.
- e. ORIG 1300.X1A, OAK RIDGE OPERATIONS STANDARDS MANAGEMENT PROGRAM, and its attached Manual, dated July 26, 1995, which describes processes for identifying ES&H requirements applicable to contractors and developing, reviewing, and approving corrective action plans.
- f. OR 13XX.1C, APPRAISAL OF CONTRACTOR PERFORMANCE, dated May 12, 1988, which reflects ORO policy, objectives, and responsibilities for appraising contractor performance.

- g. U.S. Department of Energy Report on Contract Reform, Action Item No. 27: Department-Wide Guidelines for Coordination of Contractor Oversight Programs, Undated.
- h. *Oak Ridge Operations Office Facility Representatives Program Manual*, Revision 1, dated November 1995.

7. DEFINITIONS.

- a. **Type 1 Assessments** typically involve large assessment teams and diverse scopes, are carefully planned, and may require significant contractor and DOE preparation. These assessments are coordinated across the DOE assessment groups. Type 1 assessments require more formality in the conduct of the assessment, including entrance meetings, daily or weekly briefings, and exit meetings.
- b. **Type 2 Assessments** have shorter time frames between the identified need and execution of the assessment. These assessments are typically smaller in scope, more focused to cover fewer review areas, do not have large assessment teams, and do not require significant contractor or DOE preparation. Type 2 assessments are typically needs-driven by an incident, root cause or trend information, request by another DOE organization, or the results of a contractor self-assessment or an external assessment. The rigor, scope, preparation, etc., can be scaled up or down to fit the need.
- c. **Type 3 Assessments** are also called "walk-throughs" or "walking your spaces." These would typically be used by Facility Representatives and other members of the COR's staff. These assessments require no long-range advance planning; visual observation is the technique used for conducting such assessments. If there are findings, these are tied back to requirements wherever possible so that the results can be tracked and trended using STRIDe (or equivalent standards management database).

8. CONTRACTOR REQUIREMENTS DOCUMENT. See Contractor Requirements Document, Attachment 1 of this Chapter.

9. ATTACHMENTS.

- a. Attachment 1 - Contractor Requirements Document.
- b.. Attachment 2 - ORO Oversight Model.
- c. Attachment 3 - Simplified Assessment Model Graded Application of Requirements.
- d. Attachment 4 - ORO Findings Category System.

**CONTRACTOR REQUIREMENTS DOCUMENT**

Lockheed Martin Energy Systems and Lockheed Martin Energy Research shall comply with the responsibilities and requirements which are identified in the approved S/RID.

Oak Ridge Associated Universities shall accomplish the following:

1. Conduct internal appraisals to conform to DOE 5482.1B, subparagraphs 8f and 9d and paragraph 10.
2. Respond to DOE appraisals with corrective action plans within 30 days of receipt of the final appraisal report.
3. Establish and implement ESH&Q programs such that DOE policy and Federal requirements are met.

**ORO OVERSIGHT MODEL**

<b>TYPES AND CHARACTERISTICS</b>	<b>TYPE 1 ASSESSMENTS</b>	<b>TYPE 2 ASSESSMENTS</b>	<b>TYPE 3 ASSESSMENTS</b>
Coverage	Oak Ridge Operations (ORO) Self-Assessment; ORO Assessment of Contractor	ORO Self-Assessment; ORO Assessment of Contractor	ORO Assessment of Contractor
Who does the assessment	Team from Contracting Officers' Representatives (COR) and Divisions of Primary Interest (DPI)	Individuals or focused team from COR or DPI	Individual or focused team from the COR's staff
Independent or line	Either	Either	Either
Scope	Either performance based or requirements based	Requirements based, limited functional area coverage	Observation based (i.e., walk-through)

**SIMPLIFIED ASSESSMENT MODEL  
 GRADED APPLICATION OF REQUIREMENTS**

<b>ASSESSMENT PROGRAM REQUIREMENTS</b>	<b>TYPE 1 ASSESSMENTS</b>	<b>TYPE 2 ASSESSMENTS</b>	<b>TYPE 3 ASSESSMENTS</b>
Assessments shall measure item and service quality and the adequacy of work performance.	Applicable	Applicable	Applicable
Assessments shall be performed by persons technically qualified and knowledgeable in the areas assessed.	Applicable	Applicable	Applicable
Assessments shall be planned and conducted in accordance with the assessment plan; based on criteria (performance expectations) established by law, regulation, contract, and implementation plans; and reported to the appropriate persons/organizations.	Applicable  Use Standards/ Requirements Identification Document (S/RID) database	Applicable  Use S/RID database	Not Applicable
Individual assessment plans shall be prepared with input from the assessor organization's subject matter experts. Past performance and previously identified actions necessary to improve performance shall be considered when developing the plan. The plan shall contain detail appropriate to the scope and organization performing the assessment.	Applicable	Applicable	Not Applicable
A pre-assessment meeting shall be conducted to review the assessment plan with the assessed organization and allow for the assessed organization to provide the current status of related improvement actions.	Applicable	Applicable  The rigor of the pre-assessment meeting will be consistent with the planned rigor of the assessment.	Not Applicable
The assessment plan shall be implemented, and the assessed organization notified of interim results, imminent hazards, and progress.	Applicable	Applicable	Not Applicable
A post-assessment meeting shall be conducted with the assessed organization. Positive and negative findings and significant potential vulnerabilities (e.g., imminent safety hazards and regulatory violations) shall be summarized. The category of the findings shall be provided to the assessed contractor organization. The assessed organization shall be provided an opportunity to verify the factual accuracy of the assessment results. The post-assessment process and expectations for actions in response to the assessment shall also be reviewed.	Applicable	Applicable	A post-assessment meeting shall be conducted when significant findings are identified.

ASSESSMENT PROGRAM REQUIREMENTS	TYPE 1 ASSESSMENTS	TYPE 2 ASSESSMENTS	TYPE 3 ASSESSMENTS
<p>An assessment report shall be provided to the assessed organization within 30 calendar days of the post-assessment meeting and include the following:</p> <ul style="list-style-type: none"> <li>(1) Organization, scope, desired outcome, date;</li> <li>(2) Positive and negative results based on objective evidence;</li> <li>(3) The category of the results; and</li> <li>(4) Expectations for the assessed organization to identify actions necessary to improve performance, correct the problems and prevent their recurrence, and implement the improvement actions.</li> </ul>	Applicable	Applicable	<p>Significant results will be provided to the assessed organization in an informal report no later than 15 days after identification. No formal report is required.</p>
<p>The responsible office shall track findings until closure. Closure on all Category I findings and on selected Category II corrective actions shall be verified to ensure they were completed and corrected the finding.</p>	Applicable	Applicable	Applicable
<p>The timing and frequency of oversight reviews should be coordinated to minimize and consolidate elective and discretionary reviews and to eliminate repetitious reviews.</p>	Applicable	Applicable	Not Applicable

### ORO FINDINGS CATEGORY SYSTEM

#### **CATEGORY I**

Those noncompliances which are deemed to pose an imminent threat to health, safety, or the environment and warrant a cessation of operations and/or immediate correction.

#### **CATEGORY II**

Those noncompliances or operational situations that are judged to directly or potentially directly

- (1) Have a significant adverse impact on the environment or the health and/or safety of worker or public;
- (2) Adversely impact the mission;
- (3) Represent a violation of law; or
- (4) Represent a significant noncompliance with a DOE-approved (S/RID) requirement.

#### **CATEGORY III**

Those noncompliances identified as inconsistent with good industry practices or other recommended guidelines that do not violate any applicable statutory requirements, DOE Orders, or other policy directives.

#### **CATEGORY IV AND PROFICIENCY**

Category IV items are the assessor's (or assessment team's) good ideas or best management practice suggestions. Proficiencies are those practices or areas that represent continued above average performance or exceptional positive improvement. These are areas that should represent positive examples of exceeding expectations.

**ORO ASSESSMENT SCHEDULE FORMAT**

Date Schedule Prepared: \_\_\_\_\_

ASSESSING ORGANIZATION  
FOR THE PERIOD: (12 MONTHS)

Assessment Title	Type of Assessment and Requirements Source	Designated Team Leader/ Assessor	Team Size Feds/Contractors	Start Date/Month	Estimated Number of Days on Site
(Include site, facility, discipline, and assessment description)					

Note: As a minimum, 12-month schedules show assessment dates for the first 3 months and at least indicate the month for the last 9-month period.