

EFCOG Best Practice #169

Best Practice Title: Contractor Enforcement Coordinator Training

Facility: All DOE Facilities subject to 10CFR820, 824, 830, 835, 850, and 851

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Brief Description of Best Practice: The DOE Office of Enforcement annually provides training on the enforcement processes for nuclear safety, worker safety and health and classified information security to all Contractor Enforcement Coordinators. This Best Practice presents the development and implementation of EFCOG Enforcement Coordination Working Group supplemental training, being provided to supplement the DOE training for new Enforcement Coordinators. This supplemental training is intended to provide a Contractor's perspective on meeting the expectations expressed by DOE in its annual training, and addresses the needs and issues the new Coordinator will face in supporting the enforcement process. The training will orient new Enforcement Coordinators to organizational aspects of the function, provide lessons learned from experienced personnel, provide a contractor's perspective on the function, and provide suggestions on managing roles and responsibilities, organizational interfaces, documentation, metrics, trending, and reporting.

Why the Best Practice was Used: While the DOE Office of Enforcement provides details and lessons learned on enforcement process implementation, it does not and should not prescribe methods and practices that are the responsibility of the Contractor to develop and implement. Also, there are organization specific human resource and interface issues that the Enforcement Coordinator must deal with in supporting the enforcement process, such as:

- Coordinating functions with the Field Office Enforcement Coordinator
- Recommended frequency and timing of contact with the Office of Enforcement
- How much detail must be provided in noncompliance screening
- Keeping abreast of industry issues and alerting Contractor management to these issues
- How much autonomy, independence and authority is required to manage the function
- The benefits and weaknesses of centralized versus de-centralized noncompliance screening, and,
- Other "softer," non-process issues and aspects of the function that experienced Enforcement Coordinators can impart to the new Enforcement Coordinator.

What are the Benefits of the Best Practice: The training provides core information to the new Enforcement Coordinator to better prepare him/her to be successful in working within the contractor organization as well as interfacing with Office of Enforcement personnel. Specifically it provides:

- the benefit of lessons learned from experienced Enforcement Coordinators
- alerts the new Enforcement Coordinator to some management issues that he/she will face, and provides suggestions on how to deal with them
- identifies resources, including those within the EFCOG Enforcement Coordination Working Group, that the new Enforcement Coordinator will need to be successful.

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What Problems/Issues were Associated with the Best Practice: Earlier attempts to develop similar training were not documented. However, under the current effort, a detailed, annotated PowerPoint presentation has been developed and a pilot presentation made to Enforcement Coordination Working Group leadership and Office of Enforcement management. Comments were solicited and resolved and the training was finalized and initial presentation made at the May 2014 workshop. A consensus was reached that the training would be beneficial to both new and experienced Enforcement Coordinators and that the training medium was sufficiently detailed that it could be presented by other Enforcement Coordination Working Group leadership personnel, regardless of training experience.

How the Success of the Best Practice was Measured: The training was presented at the May 2014 workshop to new and experienced Enforcement Coordinators. Verbal feedback received following this effort was very favorable and indicative of value added.

Description of Process Experience using the Best Practice: As of this date, process experience is limited to that provided at the May 2014 workshop. Continued refinement and adjustment will be provided through the use of the Survey Monkey following training at EFCOG Enforcement Coordination Working Group meetings.

This training should be considered an enhancement for the new Enforcement Coordinator in implementation of ISMS Core Functions 1 (Define the Scope of Work), 4 (Perform Work Within Controls) and 5 (Provide Feedback and Continuous Improvement). The training is directed at ISMS Principles 2 (Clear Roles and Responsibilities) and 3 (Competence Commensurate with Responsibilities).