

Targeted Assessment of Field Elements' Oversight and Evaluations of Contractor Assurance System Effectiveness

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BACKGROUND

In 2011 DOE directives began to emphasize more reliance on DOE contractor assurance systems (CASs) and provide guidance to DOE line management rather than specific oversight requirements.

Over the past five years, EA-30 has taken actions to improve its assessment of Federal oversight:

- In December 2020, EA-30 issued EA-30-07, *Federal Line Management Oversight Processes Criteria and Review Approach Document* ([CRAD](#)).
- In May 2022, EA-30 issued a new protocol EA-34-00, *Office of Nuclear Engineering and Safety Basis Assessments Protocol for High-Hazard Nuclear Facility Project Oversight*, requiring assessments of high-hazard nuclear facility projects include an evaluation of the Federal line management oversight.

Accordingly, nearly all EA-30 assessments use EA-30-07 to assess each field element's compliance with DOE directives and oversight effectiveness of specific organizational groups or functional areas. However, EA-30 has not assessed the overall effectiveness of DOE field elements' oversight.

BACKGROUND (continued)

In August 2022, a DNFSB staff report identified that DOE should improve its approach for effectiveness assessments of DOE oversight and CASs, staffing, proactive safety oversight, and safety issues management.

In April 2023, DOE responded stating that “existing oversight processes are adequate. However, there are opportunities to strengthen their effectiveness,” and identified the recently completed and ongoing efforts, such as:

- DOE will use EFCOG tools to develop CAS effectiveness evaluation criteria.
- DOE leadership will continue to champion effective measures to address staffing, retention, training, and qualification challenges.
- DOE will evaluate how best to institutionalize NNSA's SIAP process at the DOE level, including guidance on what types of oversight activities are deemed proactive and expected levels of proactive oversight.

DOE also noted that the EA assessment of DOE contractors’ management of safety issues identified “Best Practices, but also significant and extensive noncompliances in the implementation of DOE safety issues management policies and directives” and recommendations to resolve their likely causes.

BACKGROUND (continued)

This past year, the Government Accountability Office (GAO) also reported concerns with the staffing and management of DOE oversight positions. Specifically:

- GAO-24-106479, *Nuclear Waste Cleanup – Changes Needed to Address Current and Growing Shortages in Mission-Critical Positions*, dated July 2024, identified extensive understaffing and management of safety-related positions within DOE field elements.
- GAO-24-106716, *Nuclear Waste Cleanup – More Effective Oversight is Needed to Help Ensure Better Project Outcomes*, dated July 2024, also identified inadequate oversight of quality assurance practices for capital asset projects. This oversight would be additional, infrequently performed work likely requiring additional staffing.

Inadequate staffing and management of staff can reduce the effectiveness of DOE oversight allowing weaknesses in safety to develop into more significant consequences before being detected.

EA'S PLAN FOR THE TARGETED ASSESSMENT

Starting late in FY 2025, a series of site-specific assessments will be performed over a three-year campaign to assess the overall effectiveness of field elements' oversight, including their validation and use of CASs, for the NNSA, EM, and SC program offices individually.

Site-specific assessments of a field element's oversight will be performed individually or concurrently with other EA-30 technical assessments. For concurrent assessments, a site-specific report of the field element's oversight will be issued in addition to the functional/technical area assessment report.

After the site-specific assessments are completed, EA will summarize the results with separate reports on the overall effectiveness of NNSA, EM, and SC field elements' oversight of safety and emergency preparedness, including common strengths and weaknesses, best practices, and recommendations to improve their oversight.

METHODOLOGY

EA-30 is revising CRAD EA-30-07 to improve how EA assesses field element's:

- Incorporation of safety requirements and responsibilities in field element and contractor documents and procedures.
- Evaluation of CAS and safety performance by reviewing:
 - Significant issues and trends identified by the CAS and direction provided by the field element, in addition to significant safety occurrences/events and weaknesses identified by external organizations.
 - Use of the EFCOG effectiveness evaluation criteria.
- Staffing, training, and qualification of its personnel
- Planning and implementation of operational awareness and assessment activities
- Communication of assessment results
- Management of safety-related issues
- Self-assessment of the implementation and effectiveness of their oversight