

## Gap Analysis on Lessons Learned DOE O 210.2 and NV O 230.XA

Item #	DOE O 210.2, <i>DOE CORPORATE OPERATING EXPERIENCE PROGRAM</i>	NSO Implementation Procedure	Analysis <sup>1</sup> NC / NI / C	Gap and Explanation	Recommended Actions
	<b>SECTION 4 - REQUIREMENTS</b>				
1.	4a.1 A formal process must be established to evaluate operating experience from DOE and related government or industry programs, technologies and facilities.	None, except for existing LL process in NV O 230.XA		No formal process established for Operating Experiences	Write a new section in the NSO ISM Manual to comply with DOE O 210.2. Include aspects from NV O 230.XA that apply, and cancel 230.XA.
2.	4a.2 Sources of internal and external operating experience must be used to assess trends and safety issues that may have a bearing on the safety and success of DOE missions. Sources include— (a) DOE contractors; (b) DOE programs and site offices, including the Naval Reactors Program; (c) U.S. industry, professional societies, trade associations, national academies, and universities; (d) other Federal agencies [e.g., the Chemical Safety and Hazard Investigation Board (CSB), National Transportation Safety Board (NTSB), National Aeronautics and Space Administration (NASA); Nuclear Regulatory Commission (NRC), Environmental Protection Agency (EPA), etc.]; (e) foreign government and foreign industry experience; and (f) international agencies involved with energy issues [e.g., the International Energy Agency (IEA) and the International Atomic Energy Agency (IAEA)].	None, except for existing LL process in NV O 230.XA, which uses LL only from internal sources.		NV O 230.XA does not explicitly state what non-DOE sources will be used.	Incorporate or reference these sources in the NSO ISM Manual.
3.	4a.3 Operating experience must be collected, stored, and retrieved through a central clearinghouse that allows ready access to and communication about collected information on a timely, unimpeded basis by all DOE elements.	This central clearinghouse is handled by DOE HQ.	NI		State that NSO will use the central DOE clearinghouse in the NSO ISM Manual

<sup>1</sup> Analysis:

**NC** – Non-Compliant if no action taken

**NI** – Needs Improvement

**C** – Compliant

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4.	4a.4 Operating experience must be screened daily by each organization's operating experience program, in particular the designated Corporate Operating Experience Program Lead Office, for safety significance, generic technical implications or management considerations. When data suggests a significant near-term safety risk or vulnerability, those issues must be prioritized, communicated, and resolved.	<p>Primarily handled by the NNSA HQ Corporate Operating Experience Program Lead Office.</p> <p>At the site office level, the Operating Experience Program Coordinator is responsible for screening operating experience.</p>		Need more information. Is there currently a designated Operating Experience Program Coordinator?	Include responsibility for disseminating Operating Experience in NSO ISM Manual.
5.	4a.5 The following elements must be incorporated into the operating experience program: (a) performance indicators and trends, (b) site-specific issues, (c) generic technical issues, and (d) management or institutional issues.	None	NC	No current implementation.	Incorporate these elements into the NSO ISM Manual.
6.	4a.6 Designated Corporate Operating Experience Program Lead Office feedback communications on identified environment, safety and health operating experience issues with DOE Headquarters and field organizations, contractors, industry and other Federal agencies and the public must be conducted through actionable or informative operating experience documents	Handled by DOE HQ.	C	None	None
7.	4a.6a.2 Working groups formed to develop SORs are led by the Corporate Operating Experience Program Office and include subject matter experts drawn from representatives of Program Secretarial Offices (PSOs), NNSA Deputy Administrators (DAs), DOE field elements, and contractors.	Primarily handled by DOE HQ. However, how will subject matter experts (SMEs) be provided from NSO?	NI	No plan for providing SMEs from NSO when requested.	Include responsible lead NSO organizational element for providing SMEs as requested.

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8.	4a.6a.5 In response to an SOR, DOE field elements, Government-owned/Government-operated (GOGO) Sites, and contractor senior management must submit to their NNSA Deputy Administrator or PSO formal documentation of the results of their assessments, including a decision of applicability or non-applicability, actions taken or planned with completion dates, and a verification of the close-out of actions.	None	NI	No responsible NSO organizational element responsible for coordinating response.	Include responsibility in NSO ISM Manual
9.	4a.6b.4 SA recipients must review conduct of operations for similar problems or potential for purchase or use of reported suspect, counterfeit or defective items and take appropriate action to prevent adverse consequences.	None	NI	No responsible NSO organizational element responsible for coordinating review.	Include responsibility in NSO ISM Manual
10.	4a.6e.2 Recipients are encouraged to evaluate the occurrences with an eye toward taking action to ensure that— a similar events do not occur, or b existing program elements reflect best practices.	None	NI	No responsible NSO organizational element responsible for coordinating review.	Include responsibility in NSO ISM Manual
11.	4a.8 Operating experience records must be maintained according to National Archives and Records Administration (NARA)-approved DOE Record Disposition Schedules.	Need more information. Is this satisfied by the DOE HQ Operating Experience clearinghouse, or must it also be satisfied at the site office level? (e.g. NSO Central Files)	NI	Need more information.	Include copies of operating experience records to the NSO Central Files. (Do the NSO Central Files meet the NARA-approved DOE Record Disposition Schedules?)
12.	4a.9 Lessons learned must be incorporated into— (a) training, (b) maintenance and work planning, (c) operations, and (d) design and construction.	NV O 230.XA, sec. 4f states:  Applicable lessons learned information shall be identified and reviewed early in the planning phase of projects and processes, and incorporated into work activities.  Lessons learned information should be used to optimize management decision making, to interact with other management tools, and to improve worker performance.	NI	Training, and operations are not listed as areas that LL are incorporated in.	Revise section of NV O 230.XA to include items (a)-(d) as areas to incorporate LL that is put into the NSO ISM Manual
13.	4b A DOE Corporate Operating Experience Program lead office is designated in this Order and assigned responsibility for program development and oversight, and clearinghouse development and maintenance as shown in Attachment 4.	Responsibility of DOE Corporate Operating Experience lead office at DOE HQ	C	N/A	None

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14.	4c Guidance materials must be developed and maintained, and the Corporate Operating Experience Program lead office will assist DOE elements with the implementation of this Order.	Responsibility of DOE Corporate Operating Experience lead office at DOE HQ	C		Use the Lead Office as a resource in implementing this Order.
15.	4d DOE operating experience information must be collected and analyzed continuously by each organization's operating experience program, in particular the designated Corporate Operating Experience Program lead office, to identify significant crosscutting issues and trends and detect weak signals across the Department, and to take action to correct the identified weaknesses.	Primarily the responsibility of the Corporate Operating Experience Program lead office  No current NSO implementation.	NI	At the NSO level, collection and analysis also needs to be done.	Designate the NSO OEP Coordinator as responsible for the collection and analysis of operating experience at NSO.
16.	4e External operating experience data must be collected and analyzed by each organization's operating experience program, in particular the designated Corporate Operating Experience Program lead office, to identify significant issues and lessons learned to make available to the DOE complex.	Primarily the responsibility of the COEP Lead Office	C	None	Operating Exp. Program Coordinator responsible at NSO level for reviewing data.
17.	4f DOE federal and contractor organizations must share operating experience lessons learned with the DOE complex through the DOE Corporate Lessons Learned Database (URL: <a href="http://www.eh.doe.gov/DOELL/index.asp">http://www.eh.doe.gov/DOELL/index.asp</a> ) , using the standard format described in Attachment 5.	Current NV O on LL references an outdated LL List Server	NI	Outdated reference used	Update the reference from the NV O in the NSO ISM Manual to the LL Database
18.	4g DOE federal and contractor organizations must apply the following criteria when assessing whether to share a lesson learned with other DOE organizations. (See Order for criteria)	Current NV O has LL screening checklist	NI	Outdated criteria used	Update the criteria from the NV O in the NSO ISM Manual to use the new criteria
19.	4h To improve operational safety awareness, information will be gathered by the Corporate Operating Experience Program lead office from daily occurrence summaries, emergency operation center reports, weekly reports, periodic safety management meeting materials, and occurrence trend reports to assess program performance trends and the data will be disseminated DOE-wide.	Corporate Operating Experience Program lead office is responsible for processing and dissemination to NSO point of contact.	C	How is the information disseminated from the NSO point of contact to NSO entities and individuals it applies to?	See action on item #4 (4a.4)

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20.	4i Operating experience data must be shared between DOE sites with similar programs or missions.	The Lead Office operates the Database used for this.	NI	Outdated screening criteria used	See action on item #18 (4g)
21.	4j The DOE Corporate Operating Experience Program must be integrated with— 1. ISMS 2. Occurrence reporting requirements 3. Quality Assurance Program 4. Contract performance clause 5. Lessons Learned requirements	None	NC	No current formal integration plan	Describe how NSO will integrate in the NSO ISM Manual
SECTION 5 - RESPONSIBILITIES					
22.	<b>Section 5e</b> Heads of Field Elements and Contracting Activities.				
23.	5e(1) Ensure that field element processes incorporate lessons learned into training, maintenance and work planning, work processes, operations, and design and construction.	Lessons Learned currently implemented in work processes by NV O 230.XA.		LL not currently implemented in all areas.	Formally implement LL into training, etc. and document this process.
24.	5e(2) Designate operating experience program coordinators to fulfill the responsibilities assigned by this Order.	Need more information		Who are the current program coordinators?	Designate operating experience program coordinator(s), if not already designated.
25.	5e(3) Ensure that quarterly analyses of reportable and non-reportable events submitted by contractors and program field elements in accordance with Section 5.8 of DOE M 231.1-2, Occurrence Reporting and Processing of Operations Information, dated 8-19-03, are reviewed to identify operating experience trends and lessons learned.	None	NC	No plan or delegated responsibility to meet this requirement.	Perform periodic assessments of both the contractor and federal operating experience programs. Give responsibility for these assessments in NSO ISM Manual
26.	5e(4) Ensure that operating experience reports are implemented by the field element and contractor organizations through line management oversight.	None	NC	No plan or delegated responsibility to meet this requirement.	See item 25 [5e(3)] above.
27.	5e(5) As a part of self-assessments conducted to evaluate organizational performance in Integrated Safety Management (ISM), includes an assessment of the effectiveness of the organization's operating experience program.	None	NC	No plan or delegated responsibility to meet this requirement.	See item 25 [5e(3)] above.
28.	5e(6) Review contractor implementation of local operating experience programs.	None	NC	No plan or delegated responsibility to meet this requirement.	See item 25 [5e(3)] above.

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29.	5e(7) Screen contractor-developed operating experience information to ensure operational awareness.	None	NC	No plan or delegated responsibility to meet this requirement.	See item 25 [5e(3)] above.
30.	5e(8) Monitor contractor performance and sharing of lessons learned.	None	NC	No plan or delegated responsibility to meet this requirement.	See item 25 [5e(3)] above.
31.	5e(9) Share contractor performance information with the PSOs/NNSA Deputy Administrators.	None	NC	No responsible NSO element for completing this requirement.	Designate responsibility
32.	5e(10) Recommend locally developed lessons learned for inclusion in the DOE Corporate Lessons Learned Database .	Current NV O 230.XA includes screening criteria	NI	Outdated reference in NV O	See item #17 (4f) above.
33.	5e(11) Forward lessons learned applicable to specific missions or programs to the appropriate PSO/NNSA Deputy Administrator for consideration.	Current NV O 230.XA includes screening criteria	NI	Outdated reference in NV O	See item #17 (4f) above.
34.	5e(12) Ensure that senior contractor management is held accountable for recurrence of significant adverse events.	None	NI		
35.	5e(13) Ensure that operating experiences and lessons learned from departing contractors are shared with new contractors following awarding of major contracts.	None	NI		
36.	5e(14) Share operating experience lessons learned with the DOE complex through the DOE Corporate Lessons Learned Database.	Current NV O 230.XA includes screening criteria	NI	Outdated reference in NV O	See item #17 (4f) above.
37.	5e(15) Provide to the appropriate PSO or NNSA Deputy Administrator feedback concerning reviews conducted and actions taken for SOR and SA operating experience documents.	None	NC	No current plan or delegated responsibility for doing this.	See actions on items 8 and 9 above.
	<b>Section 5h</b> Operating Experience Program Coordinator				<b>For the entire section:</b> Include responsibility for the Operating Experience Program in the next edition of the NSO Functions, Responsibilities, and Authorities Manual (FRAM). In the FRAM-designated NSO AM office, ensure that a person is given the position of Operating Experience Program Coordinator. Include this position in the NSO ISM Manual

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38.	5h(1) Develops and manages organization participation in the DOE Corporate Operating Experience Program.	None	NC	No implementation procedure in place	See action on Section 5h above
39.	5h(2) Develop processes, procedures, communication methods, and documentation to implement this participation as needed.	None	NC	No implementation procedure in place	See action on Section 5h above
40.	5h(3) Elevate to the appropriate DOE manager for resolution and direction unresolved issues arising from actions or determinations on operating experience and lessons learned.	None	NC	No implementation procedure in place	See action on Section 5h above
41.	5h(4) Maintain oversight of contractor operating experience program activities (field element operating experience program coordinators ONLY).	None	NC	No implementation procedure in place	See action on Section 5h above
42.	5h(5) With the assistance of line management, ensure that site lessons learned from operating experience applicable to other DOE sites are submitted to the DOE Corporate Operating Experience Program clearinghouse.	This is currently the responsibility of the Site Lessons Learned Coordinator in NV O 230.XA	NI	Order needs to be updated	Update the section of the NV O that goes into the NSO ISM Manual to reflect the submission to DOE COEP clearinghouse.
43.	5h(6) Interact with facility personnel and field element management and oversight organizations as necessary and provide information and advice on findings to management.	None	NC		See action on Section 5h above
44.	5h(7) Follow up on significant actions or events to derive lessons learned.	None	NC		See action on Section 5h above
45.	5h(8) With the help of subject matter experts, determine applicability and significance of internal and external operating experience identified as possible lessons learned.	In NV O 230.XA this is the responsibility of the Site Lessons Learned Coordinator	NI		Update reference from O that is put into the NSO ISM Manual to Operating Experience Program Coordinator
46.	5h(9) Distribute applicable corporate and external operating experience documents to the DOE PSO and field element or GOGO personnel for review, analysis, and routine use.	None	NC		See action on Section 5h above
47.	5h(10) Participate in screening, dissemination, analysis, and development of lessons learned.	In NV O 230.XA this is the responsibility of the Site Lessons Learned Coordinator	NI		Update reference from the O that is put into the NSO ISM Manual to Operating Experience Program Coordinator
48.	5h(11) Serve as point-of-contact for the DOE Corporate Operating Experience Program.	None	NC		See action on Section 5h above

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49.	5h(12) Collect information to evaluate program effectiveness and report to management.	None	NC		See action on Section 5h above
50.	5h(13) Evaluate implementation of the operating experience reporting and lessons learned development processes to ensure compatibility and compliance with requirements of this Order.	None	NC		See action on Section 5h above
	<b>Section 5j</b> Contracting Officers				
51.	5j Once notified, ensure the incorporation of the CRD without modification into affected contracts as soon as practicable but no later than 6 months after the effective date of this Order.	Need more information. Current status unknown.			Check with CO to ensure that this will take place before the deadline, if not already completed.

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