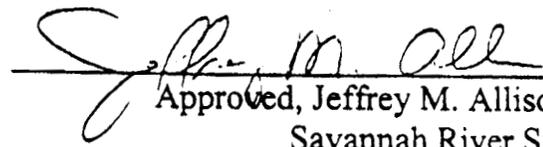


January 6, 2006
Site Action Plan
WP&C Commitment 23 – DNFSB Recommendation 2004-1



DNFSB Recommendation 2004-1
Commitment 23, Work Planning and Control
Corrective Action Plan


Approved, Jeffrey M. Allison, Manager
Savannah River Site

Note: Change Control for this Site Action Plan (SAP) resides with the Site Office Manager, with a cc to NA-10.

Executive Summary

Evaluation Process

This assessment was conducted as part of the Savannah River Site (SRS) response to Commitment #23 of the Department of Energy's Implementation Plan (IP) for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2004-1, "Oversight of Complex, High-Hazard Nuclear Operations". The assessment is the product of a joint effort of a DOE-SR/WSRC assessment team. Two members of the team were directly associated with the NNSA workshop responsible for the development of Criteria and Review Approach Documents (CRADS) and associated criteria intended for evaluation of a contractor's integrated work planning and control process, and to evaluate the DOE field office oversight of the activities associated with this process. The team applied the Work Planning and Control (WP&C) CRADS and their associated criteria, provided by Assistant Secretary of Environmental Management memorandum dated November 9, 2005, to all work planning and control processes utilized at SRS. This included the WSRC 2S Manual, Conduct of Operations, WSRC 1Y Maintenance Manual, WSRC C2 Site D&D Administrative Procedures, Procedure 2.05, "Site D&D Work Control Procedure", WSRC D3 Site Utilities Department Practices and Procedures, Procedure 4.2, "Maintenance Management Process Program Exception", and WSRC-IM-97-00024, "Savannah River National Laboratory Conduct of Research and Development".

The WP&C CRADS and associated criteria were thoroughly reviewed by the team in preparation to conduct the assessment. Additionally, the team reviewed developments in the area of work planning and control evaluation guidelines available from the NNSA work shop for this DNFSB commitment as well as the recently approved NNSA "Activity Level Work Planning and Control Processes Manual", which provides the attributes, best practices, and guidance for effective incorporation of integrated safety management and quality assurance in activity level work planning and control processes. The assessment team experienced some initial issues with the use of the terms "work planning" and "work control" in the performance of this assessment due to the established use of these terms connected with the performance of nuclear maintenance work. This required the team to consciously maintain a broader context of planning work and controlling work than a more narrow view of work planning and work control that is associated with nuclear maintenance.

This assessment was conducted in accordance with the instructions provided in the November 18, 2005 DOE Headquarters memorandum from the Chief Operating Officer for Environmental Management. Specific direction was provided to perform a review of the DOE field office and contractor in the area of work planning and control. The assessment team determined that a combination of existing assessment data and the conduct of a focused assessment would be required to fully evaluate all work planning and control processes utilized by WSRC. Facility Evaluation Board (FEB) assessment reports for Integrated Safety Management Evaluation (ISME) were available for three of the four WSRC WP&C processes. The FEB reports selected for use by this assessment report were chosen not only for their date of execution, which was within that allowed by the WP&C guidelines, but also for their inclusion of the

January 6, 2006
 Site Action Plan
 WP&C Commitment 23 – DNFSB Recommendation 2004-1

personnel interviews, document reviews, and observation of activities that fully support the HQ WP&C recommended approaches for assessing the provided CRADS. The remaining WSRC WP&C process not addressed by using the FEB reports was assessed through interviews, focused observations of work being performed and assessment of the work control process and procedures, both administratively and work planning, per the performance objectives and criteria in CRADs 3 through 7.

Overall Evaluation Summary

The results of this assessment determined that DOE-SR meets the objectives for CRAD-1 and CRAD-2 with opportunities for improvement noted in both CRAD assessment areas. WSRC was found to meet the objectives of CRAD-3 through CRAD-7 with opportunities for improvement noted in the assessment area of CRAD-3 and CRAD-7. The following table provides the results of this assessment.

CRAD #	Objective Met	Objective Partially Met	Objective Not Met	Comments
1	X			3 OFI's Noted
2	X			2 OFI's Noted
3	X			4 OFI's Noted
4	X			No issues noted
5	X			No issues noted
6	X			No issues noted
7	X			2 OFI's Noted

This review found no central DOE requirements document similar to DOE-O-433.1, "Maintenance Management Program for DOE Nuclear Facilities" that provides focused program requirement for work planning and control of work like that provided for a maintenance program for nuclear facilities. A matrix was developed to aid in the evaluation of how the WP&C CRADS were "nested" from the contract, through the S/RIDS (Standards and Requirements Document), and finally to the programs, procedures and polices for implementation. It was readily apparent, following development of this matrix, that unlike the contractor's functional area for the site Maintenance Program, which is internally reliant on compliance with the 18 elements of conduct of maintenance, the work planning and control processes for task level work such as D&D, non-nuclear site utilities and infrastructure, R&D, and many variations of subcontracted work, rely on the synergistic process that is a product of merging source requirements from numerous program functional areas (e.g., quality assurance, occupational safety and health, management systems (ISMS), project management, etc.). Multiple contract requirements generate these various program functional

January 6, 2006
Site Action Plan
WP&C Commitment 23 – DNFSB Recommendation 2004-1

areas which are the Environmental, Safety, and Health related DOE, Federal, State or local regulation and requirements applicable to WSRC work and implemented through company-level programs, procedures, and policies. The team recognized this as a challenge to developing contracts that consistently will result in a proper work planning and control process for non-maintenance work that is for example as effective as that generated for SRS D&D work, especially when flowing down requirements through a subcontract. While the assessment did not find an indication that this had hampered the ability to get SRS work done safely and consistently, the team recommended that a review be done to determine the effect that this has to the self and independent assessment, and track/trend processes of maintaining and improving performance of these non-maintenance based work planning and control processes.

This assessment determined that both WSRC and DOE-SR were able to meet the WP&C CRADS when applied to various work (e.g., operations, maintenance, construction/destruction, research and development, etc.) being performed at the Savannah River Site, and its oversight. This outcome appears to be more a result of mature contractor safety management programs supporting the accomplishment of work, the effectiveness of the enhanced assisted hazard analysis (AHA) WSRC 8Q122, a well developed Conduct of Research and Development, and experienced contractor and DOE-SR personnel. The opportunities for improvement noted by this assessment were generally not the result of a need to align current programs polices or practice to that of the expectations of improved incorporation of integrated safety management and quality assurance into work planning and control processes, but the reasonable maintenance and continual improvement of these items. As an additional opportunity for improvement, and borrowing from the NNSA suggested site action plan content, the team concluded that to enhance the ability to implement the intent of 2004-1 Commitment #23 that a recommendation be made to change DOE Order 5480.19 “Conduct of Operations for DOE Facilities” to add a 19th element for “Integrated Work Planning and Control” and to change DOE-STD-1063 to describe the facility representative oversight of work beyond the currently described as facility maintenance. These change recommendations will be provided to the SRS ISMS Champion to discuss in the complex wide ISMS reinvigoration team meetings.

Section I – DOE Deliverables, and Due Dates for WP&C Corrective Actions

Section II – Contractor Actions Deliverables, and Due Dates for WP&C Corrective Actions

Section III - WP&C “Good Practices”

SECTION I

Performance Objective WPC-1: Work Planning and Control Oversight

Opportunity for Improvement #1

Review of DOE-SR FRAP, FR PDs, and SRIP 430.1 by DOE management to determine if changes should be made to these documents to ensure the consistent utilization of FRs and to add clarity in the expectation of oversight of all aspects of the contractor's work planning and control process.

DOE Action	Deliverable	Due Date	Owner/Org
Review the DOE-SR FRAP to see if changes are needed to ensure the consistent utilization of FRs and to add clarity in the expectation of FR oversight of all aspects of the contractor's work planning and control process.	Completion of review and approval of change package to FRAP if required.	7/30/06	Terry O. Frizzell Director, Human Resources Management and Development Division
Review the FR position descriptions (PDs) to ensure consistent utilization of FRs and to add clarity in the expectation of FR oversight of all aspects of the contractor's work planning and control process.	Completion of review and approval of change package(s) if required.	7/30/06	Terry O. Frizzell Director, Human Resources Management and Development Division

Responsible Manager: Frank Wright, Manager, Office of Human Capital Management

DOE Action	Deliverable	Due Date	Owner/Org
Review SRIP 430.1 for clarity of expectation for FR oversight responsibilities for work planning and control processes using 2004-1 Commitment #23 as a guide	Completion of review and approval of change package if required.	5/30/06	Carl A. Everatt Site Facility Representative Champion

Responsible Manager: Carl A. Everatt, Acting, Assistant Manager for Waste Disposition Projects (AMWDP)

January 6, 2006
 Site Action Plan

WP&C Commitment 23 – DNFSB Recommendation 2004-1

Opportunity for Improvement #2

A review should be conducted of those organizations assigned contractor oversight responsibility to determine if there is a need to expand work planning and control oversight responsibilities beyond the FR position.

DOE Action	Deliverable	Due Date	Owner/Org
Organizations assigned contractor oversight responsibilities should review FR oversight responsibilities to determine if there is a need to expand work planning and control oversight responsibilities beyond the FR position. Review entails analysis of current work force against 2004-1 Commitment #23 WP&C oversight expectations.	Complete review of the DOE-SR 5-Year Workforce Management Plan and approval of change package if required	6/30/06	Jim Folk Contractor Human Resources and Organizational Evaluation Team (CHROET)

Responsible Manager: Frank Wright, Manager, Office of Human Capital Management

Opportunity for Improvement #3

Recommend revision to DOE-STD-1063 and DOE Order 5480.19, to establish consistent DOE expectation of FR oversight of work planning and control at the task level for all nature of work (i.e., operations, maintenance, construction/destruction, research and development, etc.) and to extend conduct of operations to include the integrated work planning and control process requirements.

DOE-SR Action	Deliverable	Due Date	Owner/Org
Propose change to DOE-STD-1063 and DOE Order 5480.19 to the ISMS Champions Council for consideration.	Provide a position paper for proposed DOE directive changes, based on the WP&C assessment report, to the SRS ISMS Champion to support submittal of the recommended changes to the ISMS Champions Council for consideration.	4/30/06	Randall J. Clendenning Director, Safety and Radiation Protection Division

Responsible Manager: Karen L. Hooker, Manager, Office of Environment, Safety, and Health

Performance Objective WPC-2: Work Planning and Control Oversight

Opportunity for Improvement #1

Extend the Site Issues Management and Technical Assessment System (SIMTAS) to include a Work Planning and Control (WP&C) Process assessment area that uses the HQ WP&C CRADS, and the associated WP&C criteria as lines of inquiry (LOIs).

DOE-SR Action	Deliverable	Due Date	Owner/Org
Extend SIMTAS to include an assessment area for Work Planning and Control using HQ WP&C CRADS, and the associated WP&C criteria as lines of inquiry (LOIs).	Change to SIMTAS and an implementing e-mail notification to SIMTAS users	5/30/06	Donna A. Jackson DOE-SR Technical Assessment Program Manager

Responsible Manager: Randall J. Clendenning, Director, Safety and Radiation Protection Division

Opportunity for Improvement #2

Review SRIP 430.1 "Facility Representative Program" to determine the need to standardize the expectation of including the Track and Trend assessment in the annual assessment plan and to use SIMTAS to document the Track and Trend assessment.

DOE-SR Action	Deliverable	Due Date	Owner/Org
Change SRIP 430.1 "Facility Representative Program" to standardize the expectation of including the Track and Trend assessment in the annual assessment plan and to use SIMTAS to document it.	Completion of review and approval of change package if required.	5/30/06	Carl A. Everatt Site Facility Representative Champion

Responsible Manager: Carl A. Everatt, Acting, Assistant Manager for Waste Disposition Projects (AMWDP)

SECTION II

Performance Objective WPC-3: Work Control Program Documentation

Opportunity for Improvement #1

WSRC 1Q, Procedure 5.1 “Instructions, Procedures, and Drawings”, Section B “Preparing Procedures/Instructions”, Step (4) needs to clearly identify the various Site work control processes for activities such as Operations, Maintenance, Research & Development, D&D, etc.

WSRC Action	Deliverable	Due Date	Owner/Org
Revise 1Q Procedure 5.1 to identify the various types of work control processes used for all types of work (operations, maintenance, research & development, D&D, etc.)	Review & revise 1Q, Procedure 5.1 to further identify and clarify the various processes contained in Site manuals & procedures for work planning and control (operations, maintenance, research & development, D&D, etc.)	3/31/06	Lori Vaught/Site Quality Services Mgr.

Responsible Manager: Lori Vaught/ Site Quality Services Manager

Opportunity for Improvement #2

Currently 8Q, Procedure 122, Assisted Hazard Analysis (AHA) is the site process for identifying hazards, specifying controls, and work authorization and release for the safe execution of work. This procedure includes requirements for work scope definitions, hazard analysis, development and implementation of hazard controls, performance of work within controls, feedback, applicability to new and revised procedures, and applicability to subcontractor work. The Hazard Category Determination (HCD) process within AHA provides a method for grading hazards associated with an activity so the appropriate hazard analysis tool can be applied and the corresponding level of management review and approval can be obtained. This is implemented via facility Standing Orders which vary from facility to facility as determined by the Facility Manager. The effectiveness of this HCD process via Standing Orders is to be evaluated in an effectiveness review of the facilities in March 06. Additionally, WSRC has recognized the inconsistency in implementation of AHA feedback and post work reviews.

January 6, 2006
 Site Action Plan
 WP&C Commitment 23 – DNFSB Recommendation 2004-1

WSRC Action	Deliverable	Due Date	Owner/Org
1. Include the HCD process in the upcoming facility effectiveness review for the implementation of 8Q, 122 AHA.	1. Perform the facility effectiveness reviews for the implementation of 8Q, 122, AHA.	3/31/06	Bill Rigot, CBU Engineering & QA
2. Revise 8Q, 122 AHA to specify what types of AHA's require a post review.	2. Revise 8Q, 122 to specify post reviews required for "full", and "team" AHAs, and optional for "pre-screened" AHAs.	3/31/06	Jim Tisaranni, CBU Safety Mgr.
3. Improve the AHA feedback mechanism.	3. Rewrite the AHA software to place mandatory controls that require post reviews to be completed on "full" and "team" AHAs before the AHA can be closed.	3/31/06	Jim Tisaranni, CBU Safety Mgr.

Responsible Manager: Jim Tisaranni, Closure Business Unit Safety Manager

Opportunity for Improvement #3

WSRC 8Q15 "Subcontractor Safety Requirements" specifies requirements for oversight of subcontractors. SDD exceeded the requirements of 8Q15 by developing a SDD Subcontractor Review Team to establish consistent safety performance of their subcontractors. This noteworthy practice may be considered for sitewide application.

WSRC Action	Deliverable	Due Date	Owner/Org
Review 8Q15 for possible change based on "best practices" by SDD in the development WSRC-RP-2004-4540 administrative procedure that exceeds the oversight requirements for subcontractors.	Review the SDD WSRC-RP-2004-4540 best practice and determine if this practice should be incorporated in 8Q15 for sitewide application.	3/31/06	Kevin Smith, Owner 8Q15

Responsible Manager: Mark Schmitz, Site ESH Manager

Opportunity for Improvement #4

Documenting turnover is not specifically required by the requirements listed for the CRADS provided by DOE-HQ other than for operations. Turnover requirements for work and maintenance appear to be a good practice for these types of activities. Generally the various projects, such as the nuclear facilities and non-nuclear operations follow 2S Manual, Conduct of Operations. Site D&D Manual, C2, Procedure 2.05 needs to be changed to incorporate the documentation of the turnover to provide objective evidence of performing the management expectation of turnover of responsibilities.

WSRC Action	Deliverable	Due Date	Owner/Org
SDD will revise C2, Procedure 2.05 to incorporate requirements for documentation of turnover.	Revise C2, 2.05 to define responsibilities and expectations for turnover.	3/31/06	Terry Hunter, SDD Work Control Mgr.

Responsible Manager: Terry Hunter, Site D&D Work Control Manager

Performance Objective WPC-7: Work Planning and Control Oversight

Opportunity for Improvement #1

Independent and Self Assessment processes of WSRC 12Q Assessment Manual and SCD-4 currently encompass the Work Planning and Control requirements through multiple functional areas. 12Q Manual describes WSRC's self-assessment process and defines the minimum requirements for the process. The goal of the self-assessment process is to identify and correct problems that hinder the organization from achieving its objectives and to prevent the recurrence of more serious problems. The program consists of assessments that are contractually required, required by procedure, and assessments that are based on management discretion. In reviewing several self-assessment plans (SUD & SDD) it was noted that the existing self-assessment process could result in one or more functional areas not being assessed due to the discretion allowed by the procedure. This discretion needs to be reviewed to determine if the results meet the expectations of the 12Q process.

Currently the primary area for assessing work planning and control is SCD-4 Functional Area 10, Maintenance. However there are other functions that have processes for work planning and control that are not fully integrated with other applicable site procedures. While there is no DOE requirement to have a central system or single functional assessment for WP&C assessments, WSRC has an integrated approach that inter-relates the contractual requirements to the functional area requirements. Even though this process did not hamper work being performed safely or consistently, it was difficult to evaluate the CRAD criteria for WP&C. This appears to be an opportunity where WSRC could further integrate the various work planning and control processes into functional area assessments and site procedures.

WSRC Action	Deliverable	Due Date	Owner/Org
1. Review 12Q Assessment Manual and SCD-4 to determine if this flexibility is intended and acceptable.	1. Review 12Q to determine if the current criteria for management discretion needs to be revised.	3/31/06	Lori Vaught, Site Quality Services Mgr.
2. Review applicable functional areas and Site QA procedures to incorporate the various work planning and control processes.	2. Review functional areas and 1Q procedures to define various work control processes and include CRAD criteria for WP&C as appropriate.	4/30/06	Lori Vaught, Site Quality Services Mgr. Dennis Booth, Site Maintenance Services Mgr.

Responsible Manager: Lori Vaught, Site Quality Services Manager

January 6, 2006
Site Action Plan
WP&C Commitment 23 – DNFSB Recommendation 2004-1

Opportunity for Improvement #2

Review facilities and projects for consistent use of Site Tracking Analysis and Reporting System Issue Reports (STAR) to capture issues for assignment of corrective actions, tracking corrective action to completion, effectiveness review of the corrective action(s), and for tracking and trending. This is a focus area by the WSRC President and is scheduled for another effectiveness review in 2006.

WSRC Action	Deliverable	Due Date	Owner/Org
Perform a site effectiveness review of the consistent utilization of STAR by facilities and projects.	Included in DNFSB 2004-1 Commitment 25, Feedback and Improvement Corrective Action Plan.	NA	NA

SECTION III

WP&C “Good Practices”

	Good Practice	Point of Contact
1.	WSRC Assisted Hazard Analysis procedure 8Q122 and associated Safety Work Permit (SWP) – The assisted hazard analysis process has been enhanced and provided a work authorization control in the form of the SWP. Piloting of the new 8Q122 and the associated SWP has improved the job hazards analysis and the changes have been well received by the work force, particularly the SWP. The WP&C assessment team found 8Q122 and the SWP to satisfy a predominate portion of the WP&C attributes.	Jim Tisaranni WSRC lead for WSRC Manual 8Q, Procedure 122 “Assisted Hazard Analysis” (803)208-3171
2.	WSRC Site Tracking, Analysis, and Reporting (STAR) system and the associated Performance Analysis (PA) system. These relatively new WSRC processes have markedly improved the ability to capture operational information which in turn is improving tracking, trending and feedback abilities. Systems are effective at the facility /project level and at the site/program level.	William Luce WSRC lead for WSRC, Manual 1B, Procedure MRP-4.23 “STAR” WSRC, Manual 12Q, Procedure PA-1 “Performance Analysis”
3.	WSRC “Point Of Entry” (POE) process provides controls for subcontractors, vendors, and visitors to ensure personnel entering the site are properly screened prior to entry to determine the nature of their work and to document who on site that is responsible for them. The process is included in the WSRC 8Q “Safety Manual, Procedure 15, “Workplace Safety and Health Program for SRS Visitors, Vendors, and WSRC/BSRI Subcontracts”.	Kevin Smith WSRC lead for WSRC 8Q “Safety Manual”, Procedure 15 “Workplace Safety and Health Program for SRS Visitors, Vendors, and WSRC/BSRI Subcontracts”. (803)952-9924
4.	WSRC “Time Out” policy provides the ability of workers to place activities in abeyance without resorting to the “Stop Work” action. This has been well received by the work force and is actively promoted by management, including positive recognition of those utilizing the policy. The “Time Out” policy is included in the WSRC 8Q “Safety Manual”, Procedure 1, “Safety Policy and Program Responsibilities”	Kevin Smith WSRC lead for WSRC 8Q “Safety Manual”, Procedure 1, “Safety Policy and Program Responsibilities” (803)952-9924