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**Department of Energy**

Washington, DC 20585

April 15, 1996

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DNF SAFETY BOARD

The Honorable John T. Conway  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW  
Washington, DC 20004

Dear Mr. Chairman:

The Department of Energy (DOE) has addressed the safety concerns raised by Defense Nuclear Facility Safety Board (DNFSB) Recommendation 92-2, regarding Facility Representative Programs at DOE's Defense Nuclear Facilities. As a part of our implementation of DNFSB Recommendation 92-2, the Department has performed a task force analysis of the Facility Representative Program implementation status. This letter transmits the report of this effort.

The report addresses program implementation, training issues, and ongoing program initiatives. It also addresses the future outlook for DOE's Facility Representative Program. The program has matured greatly since the Recommendation was first issued, and the Department continues to improve the program to increase its effectiveness.

It is our understanding that this report is the final deliverable under the 92-2 Implementation Plan. The Department has completed the commitments identified under this Recommendation and proposes closure of this Recommendation.

If you have any questions regarding the report, please feel free to contact me or Joe Hassenfeldt at 202 586-1643.

Sincerely,

A handwritten signature in black ink, appearing to read "D. W. Pearman, Jr.", written over a horizontal line.

Donald W. Pearman, Jr.  
Associate Deputy Secretary  
for Field Management

Enclosures

cc:

B. G. Twining, Albuquerque Operations Office  
C. J. Langenfeld, Chicago Operations Office  
J. M. Wilcynski, Idaho Operations Office  
T. Vaeth, Nevada Operations Office  
J. Turner, Oakland Operations Office  
J. Hall, Oak Ridge Operations Office  
J. P. Hamric, Ohio Field Office  
J. D. Wagoner, Richland Operations Office  
M. N. Silverman, Rocky Flats Field Office  
M. P. Fiori, Savannah River Operations Office

T. Grumbly, S-3, EM-1  
V. Reis, DP-1  
T. O'Toole, EH-1  
M. Krebs, ER-1  
A. Durham, HR-1  
T. Lash, NE-1

## Report on the Department of Energy's Facility Representative Program

### Program Implementation

On January 30, 1996, the Department of Energy (DOE) held a task force meeting to assess the status of implementation of the Facility Representative (FacRep) Program at DOE's Defense Nuclear Facilities. The group was comprised of representatives of the Facility Representative Steering Committee, from DOE headquarters and the field (Attachment 1) and utilized FacRep Program information and analyses performed over the last year by headquarters and field personnel. The program review was based on DOE Standard 1063-93, "Establishing and Maintaining a Facility Representative Program at DOE Nuclear Facilities." This review represents the last action item (Commitment #006) in the Implementation Plan for Defense Nuclear Facility Safety Board (DNFSB) Recommendation 92-2.

The task force looked at the performance of DOE's Defense Nuclear Facilities Operations Offices, and addressed the program elements of training and qualification, written and oral examinations, FacRep responsibilities and duties, records administration, and program documentation (Attachment 2). For the element of program documentation, all nine Defense Nuclear Facilities Operations Offices have program documentation in place which supports the intent of DOE STD 1063-93. Additionally, seven of the nine offices have established programs which adequately satisfy STD 1063-93 guidance for all of the program elements. Only two Offices had unsatisfactory areas noted. These will be addressed later in this document.

These results lead the task force to agree that the Department has implemented the DOE Standard 1063-93, and has established the framework upon which a mature FacRep Program can be carried. This finding is substantiated by three years of baseline and follow-up reviews conducted between 1993 and 1995. These reviews have been forwarded to the DNFSB as they were performed and as enclosures to the FacRep Quarterly Status Reports to the Board, and carry the specifics for the details cited above.

There has also been extensive work conducted between Operations Offices to share processes and lessons-learned on program implementation. The program has progressed from being little more than ad hoc DOE staff in a few facilities, to a comprehensive, Department-wide program encompassing more than 200 facility representatives. The Department has conducted extensive facility analyses, and complex-wide, has hired 96% of the optimum 223 FacReps.

The Department will continue to assess the status of the Facility Representative Program and the program implementation at the Operations Offices. In cases where the program does not meet the expectations of the line program, corrective actions will be determined in order to improve program performance. Such is the case with the Richland Operations Office, which received an unsatisfactory grade during their FacRep Program review in 1995. Since that time RL has taken corrective actions to strengthen the effectiveness of their program and eliminate the concerns

expressed during the review. The Offices of Environmental Management and Field Management will verify the effectiveness of the corrective actions during the 1996 review cycle.

### Training and Qualification

Operations Offices have analyzed the training requirements necessary to fully qualify Facility Representative incumbents and candidates currently on board, and have found that training is available and sufficient to accomplish full qualification. Many sites are committed to continuing the selection of FacReps from commercial nuclear, Nuclear Regulatory Commission, or Navy Nuclear Power sources, including shipyards, to minimize the need to provide fundamental training and the need to 'teach' candidates how to qualify.

Most Defense Nuclear Facility sites have two or three levels of qualification in place, and the Department has core/interimly qualified 54% of its FacReps, and has fully qualified 26%. The key reasons that more of the Department's FacReps are not farther in their qualification are experience level, on-the-job requirements, and FacRep Program implementation. Specifically, the people brought into the FacRep program entered their positions as highly experienced engineers and scientists who walked into the facility with much of the necessary training to determine unsafe conditions in their respective facilities. These people were immediately placed in the facilities, and as qualification criteria were instituted, began the process of qualification. Many of these individuals, however, were also responsible to develop these qualification programs and criteria, as well as fulfilling their responsibilities to their facilities.

As part of DNFSB Recommendation 93-3, the Technical Personnel Program Coordinator will maintain a catalog of validated training courses across the DOE complex to satisfy the competencies that are required in the General Technical Base Qualification standard and the Facility Representative Qualification Standard. This is a current activity which will be supported by the Technical Personnel Program Coordinating Committee which represents the headquarters and field organizations from the training perspective. The Management sponsor for the FacRep Qualification Standard is the Office of Field Management (FM) and FM will continue its involvement in the 93-3 process to ensure the long term integrity of the FacRep program.

Under Recommendation 93-3, there are essentially three tiers in a Facility Representative qualification program. The first tier is the General Technical Base Qualification Standard (GTBQS), and the second tier is the FacRep Qualification Standard (FRQS).

Those site/facility specific qualification standards that are already in place in the field, effectively form the third tier of standards at each site under the 93-3 structure. In some cases, the FacRep training programs already in place will remain in their present form, with only the addition of the few requirements from the GTBQS and the FRQS which were not already present in the existing program. In either case, the FacRep Program is committed to maintaining the rigor of its training and qualification programs at the Operations Offices, even though the present level may be above that required by DOE Orders. Field Management and the Program Offices will look for this rigor and the adherence to the principles of Recommendation 93-3 during FacRep Program reviews at the Operations Offices.

### Examinations

Eight of nine Operations Offices had examinations (oral and written) specified in their implementing documentation. Exam banks are maintained, and are being continually improved. The one office (Ohio) where an unsatisfactory grade was given on this program element had no provisions for written and oral examinations in its program directive at the time of the review. Since that time, the office has issued a revised directive which satisfactorily addresses examinations. The office has also established an initial bank of examination questions, and has been working to further develop its exam bank by gathering questions from other, more developed exam banks at other Operations Offices.

### Responsibilities and Duties

Seven of nine Operations Offices had satisfactory programs regarding the documentation and performance of the FacRep's responsibilities and duties. The Richland Operations Office did not adequately address this area at the time of its program review. Since that time the office has implemented improvements in its program directive, assigned an experienced individual to aggressively repair the Richland program, and made specific changes to its organizational structure to ensure the proper FacRep program performance. The Richland Office will be reviewed during the late spring of 1996, and the review will focus very specifically on those areas which were shown to be weak in 1995's review. The Ohio Field Office's specific implementation has not been observed, but the office's directive is extremely thorough in its handling of FacRep responsibilities and duties, and its program will also receive specific focus on its weak areas during the 1996 review cycle.

### Records Administration

Seven of nine Operations/Field Offices had satisfactory programs for qualification, training, assessment, and FacRep program record keeping. Program directives point to specific methods and locations for record keeping, and facility discrepancy tracking. The Ohio Field Office did not have adequate depth of records management. This is largely attributed to problems in the startup of the Operations Office, but the office has addressed these issues of records management with changes to its program directive. Specific data from Savannah River Operations Office has not been observed.

## Ongoing Initiatives

Since the issuance of DOE STD 1063-93, the Department has initiated a number of elements within the Facility Representative Program that work to institutionalize the program at DOE. As these initiatives mature they will greatly add to the Department's increasingly robust FacRep Program.

The Department has developed and is implementing a process for reporting FacRep program performance indicators to track field performance on a quarterly basis. These indicators will be reported to the Cognizant Secretarial Offices and to the Office of Field Management. As these program performance indicators are being piloted, the headquarters offices and Field Management will work closely with the field to ensure that this self-assessment information is relevant, and useful to headquarters and field offices. In this way the Department can use current Operations Office self-assessment information to maintain cognizance of program status.

In addition to quarterly reporting of performance indicators, the Office of Field Management and the line Program Offices will continue to annually assess the adequacy of the FacRep Program at the Operations Offices. These reviews will largely be conducted in conjunction with Conduct of Operations Reviews, Operational Readiness Reviews, and other field office oversight activities in order to maximize communication of the information gathered during reviews, and to minimize the impact on Operations Office schedule.

The Department will continue to utilize the FacRep Steering Committee to act as an advisory body for FacRep Program issues, to improve consistency, and to ensure thorough communication of information on issues affecting the FacRep Program. The Steering Committee, which meets quarterly, will continue to make recommendations to the program offices for action and improvement of the Facility Representative Program.

The annual Facility Representative meeting, sponsored by the Office of the Associate Deputy Secretary for Field Management, will continue. The networking and communications gains from this and other FacRep meetings have been very successful in bringing about program improvements. The meetings are also an ideal forum to bring in guest speakers and senior managers to show upper management support and to recognize the importance of the Facility Representative Program. As in the past, guest speakers will be sought who can speak to the important topics of worker safety, program management, and program oversight.

In addition to national meeting annually, many Operations Offices hold quarterly or even monthly Facility Representatives' Meetings. These meetings communicate lessons-learned on a smaller scale, allowing peers to share insights of specific contractor organizations. Frequently, problems which appear small can be seen as endemic of the contractor organization, and appropriate changes in operations can be made to eliminate the prime cause of the problem.

During 1995, the Department approved the Facility Representative of the Year Award to recognize superior or exemplary service during a given calendar year. At the 1996 annual

FacRep meeting, the first annual Facility Representative of the Year Award will be presented. The recipient will receive a citation, a plaque, and a monetary award of up to \$1000.

The Department's FacReps are also organizing a Facility Representative Professional Association. This year it is expecting that a formal charter will be approved, officers selected, and by-laws determined, as appropriate.

The Facility Representative Program has its own 'page' on the World Wide Web on the Office of Environmental Management's 'Homepage.' This FacRep page is entirely devoted to Facility Representative issues, program assessments, and topics of concern. The page is another tool to disseminate information on FacRep issues and opportunities to learn from the work of peers and colleagues throughout the complex. Future links to the Field Management Homepage, the DOE Lessons Learned Homepage, and possibly other homepages are envisioned.

### Conclusion

The Department believes that a strong, effective FacRep program can only be realized through strong, responsible management and continual assessment by line organizations, and safe, competent execution by the field. The Office of Field Management will continue to forcefully, proactively work toward continuous improvement of the FacRep Program as it matures. The Technical Personnel Program Coordinator has committed to support the technical training requirements of the Facility Representative Program in the future. This catalytic coordination of line and staff functions has been a key to the successful implementation of the FacRep Program, and will continue to enhance the program's effectiveness in the future.

As the Facility Representative Program transitions from an implementation phase to a maintenance and improvement phase, the role of the DOE cognizant program office becomes increasingly important. The importance of the Facility Representative and the line program role are particularly pivotal in facilities coming under the Maintenance and Integrating (M&I) contractor concept. Under the M&I model, the FacRep will serve as DOE's bridge across possible additional layers of contractors. Throughout DOE, the Facility Representative is recognized as the field eyes and ears of the Contracting Officer, and is the federal employee most likely to directly effect the safe operation of DOE facilities.

Roster January 30, 1996  
Facility Representative Steering Committee Meeting

Ken Kellar	DP
John Kaysak	EM
Ray Schwartz	ER
Max Clausen	FM
Joe Hassenfeldt	FM
Mark Holzmer	ID
Joe Arango	S3.1



Functional Area	AL	ID	NV	OAK	OH	OR	RF	RL	SR
The Office has an approved program policy which satisfies DOE-STD-1063-93 and Field Management guidance.	S	S	S	S	S	S	S	S	S
Facility Representatives are assigned to facilities based on an assessment of facility hazards and activity level.	S	S	S	S	N/O	S	S	U	S
Facility Representatives have completed specific education, experience, training, and qualification requirements, including periodic requalification.	S	S	S	S	S	S	S	U	S
Formal procedures exist for the administration of written and oral examinations. F/Rs have completed written and oral examinations prior to qualification.	S	S	S	S	U	S	S	S	S
F/Rs spend the majority of their time in their assigned facilities observing operations and assessing operating conditions. F/Rs have unencumbered facility access and stop work authority. F/Rs ensure that line management is cognizant of current facility conditions. F/Rs are not assigned budget or schedule related duties for their assigned facilities.	S	S	S	S	N/O	S	S	U	S
F/Rs maintain an auditable record of their activities and observations. Qualification and exam records are maintained on file.	S	S	S	S	U	S	S	S	N/O

The above grades are based on reviews by EM-25 and FM-10 of facility representative programs at each DOE office. A grade of unsatisfactory means that the implementation criteria were not met.

#### Grading Key

S = satisfactory

N/O = not observed

U = unsatisfactory

N/A = not applicable