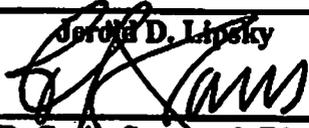


## FACILITY REPRESENTATIVE PROGRAM

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**Title: Facility Representative Program**

**CHANGE SUMMARY LOG**

<b>Description of Change</b>	<b>Effective Date</b>
<p>This revision cancels all previous revisions and incorporates the following:</p> <ul style="list-style-type: none"><li>• Revisions and clarifications throughout entire document;</li><li>• Updates References;</li></ul>	<p><b>2-27-18</b></p>

**Title: Facility Representative Program**

**TABLE OF CONTENTS**

<b>1.0</b>	<b>PURPOSE AND SCOPE.....</b>	<b>4</b>
1.1	Purpose.....	4
1.2	Scope.....	4
<b>2.0</b>	<b>REFERENCES.....</b>	<b>4</b>
<b>3.0</b>	<b>ATTACHMENTS .....</b>	<b>5</b>
<b>4.0</b>	<b>ACRONYMS AND DEFINITIONS .....</b>	<b>5</b>
4.1	Acronyms .....	5
4.2	Definitions.....	6
<b>5.0</b>	<b>GENERAL.....</b>	<b>9</b>
<b>6.0</b>	<b>PROCEDURE .....</b>	<b>12</b>
6.1	Facility Representative (FR) Program and Qualification .....	12
6.2	Facility Representative Council (FRC).....	13
6.3	Facility Representative Facility Coverage .....	13
6.4	Assessment Program Development .....	14
6.5	Facility Representative Assessment Performance .....	14
6.6	Facility Representative Interface with Subject Matter Experts (SMEs).....	15
6.7	Communications .....	15
6.8	Emergency Event Response and Occurrence Reporting Activities .....	17
6.9	Shift Coverage and Turnover.....	19
<b>7.0</b>	<b>RECORDS.....</b>	<b>20</b>
7.1	Records Control .....	20
7.2	Records Generated.....	20
<b>ATTACHMENTS.....</b>		<b>21</b>
Attachment A	Assessment Program Guidelines.....	21
Attachment B	Facility Representative Program Guidance.....	23

**Title: Facility Representative Program**

**1.0 PURPOSE AND SCOPE**

**1.1 PURPOSE**

This directive establishes the responsibilities and requirements for the Facility Representative (FR) Program.

**1.2 SCOPE**

This directive applies to all Department of Energy Savannah River (DOE-SR) federal employees. The National Nuclear Security Administration Savannah River Field Office (NNSA-SRFO) may elect to adopt this directive for conduct of their business.

**2.0 REFERENCES**

- 2.1 DOE O 151.1D, "Comprehensive Emergency Management System"
- 2.2 DOE O 200.1A, Chg 1, "Information Technology Management"
- 2.3 DOE O 226.1B, "Implementation of the Department of Energy Oversight Policy"
- 2.4 DOE O 231.1B, Admin Chg 1, "Environment, Safety, and Health Reporting"
- 2.5 DOE O 232.2A, "Occurrence Reporting and Processing of Operations Information"
- 2.6 DOE O 414.1D, Chg 1, "Quality Assurance"
- 2.7 DOE O 420.1C, Chg 1, "Facility Safety"
- 2.8 DOE O 422.1, Chg 2, "Conduct of Operations"
- 2.9 DOE O 426.2, Chg 1, "Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities"
- 2.10 DOE O 430.1C, "Real Property Asset Management"
- 2.11 DOE O 433.1B, Chg 1, "Maintenance Management Program for DOE Nuclear Facilities"
- 2.12 DOE O 470.4B, Chg 2, "Safeguards and Security Program"
- 2.13 DOE O 471.6, Chg 2, "Information Security"
- 2.14 DOE O 541.1C, "Appointment of Contracting Officers and Contracting Officer Representatives"
- 2.15 10 CFR 830, "Nuclear Safety Management"

**Title: Facility Representative Program**

- 2.16 DOE-STD-1063-2017, “Facility Representatives”
- 2.17 DEAR 970.5204-79, “Access to and Ownership of Records”
- 2.18 SRM 300.1.1B, Chapter 6, Section 6.1, “Technical Qualification Program (TQP)”
- 2.19 SRM 414.1.1F, “Quality Assurance Program Manual”
- 2.20 SRM 226.1.1F, “Integrated Performance Assurance Manual”
- 2.21 SRIP 400, Chapter 420.1, “DOE-SR Notification to the Contractor of an Adverse Condition/Stop Work Order”
- 2.22 SRIP 200, Chapter 243.1, “Records Management Program”
- 2.23 SRNS 6Q, Volume II, “SRS Emergency Plan/Emergency Management Program Procedures Manual”
- 2.24 NIRMA Technical Guide (TG-11) 2007, “Authentication of Records and Media”
- 2.25 Environmental Management Contractor Requirements Document “Supplemented DOE O 232.2A”, Rev. 0

**3.0 ATTACHMENTS**

<u>Attachment</u>	<u>Title</u>	<u>Page</u>
A	Assessment Program Guidelines	21
B	Facility Representative Program Guidance	23

**4.0 ACRONYMS AND DEFINITIONS**

**4.1 ACRONYMS**

AAP	Annual Assessment Plan
AM/OD	Assistant Manager/Office Director
COR	Contracting Officer Representative
CFR	Code of Federal Regulations
DEAR	Department of Energy Acquisition Regulation
DO	Duty Officer
DOE	Department of Energy
EM	Environmental Management
ES&H	Environmental, Safety, and Health

**Title: Facility Representative Program**

FR	Facility Representative
FRC	Facility Representative Council
FTE	Full Time Equivalent
HQ	Department of Energy-Headquarters
IPAM	Integrated Performance Assurance Manual
NNSA-SRFO	National Nuclear Security Administration Savannah River Field Office
ORPS	Occurrence Reporting and Processing System
OSQA	Office of Safety and Quality Assurance
OSSES	Office of Safeguards, Security, and Emergency Services
SC/SS	Safety Class/Safety Significant
SME	Subject Matter Experts
SR	Savannah River Operations Office
SRIP	Savannah River Implementing Procedure
SRM	Savannah River Manual
SRS	Savannah River Site
S/RID	Standards/Requirements Identification Document
STD	Standard
SWO	Stop Work Order
TQP	Technical Qualification Program
TSR	Technical Safety Requirement

**NOTE:** When “TSR” is used in this SRIP, it is also intended to include Operational Safety Requirements.

## 4.2 DEFINITIONS

- 4.2.1 **Assessment**: The SRS assessment program is described in the IPAM. FRs typically perform Internal Assessments.
- 4.2.2 **Assessment Results**: Documentation of assessment results is discussed in the IPAM.
- 4.2.3 **Backshift**: From 6:00 pm until 6:00 am, all day Saturday, Sunday, and Holidays; and other non-scheduled or non-routine work hours for facility operations management and support personnel.
- 4.2.4 **Business day**: The normal administrative day of the reporting organization (e.g., Monday through Friday, 0800 to 1700 hours local time) during which normal work activities are conducted. It is not meant to encompass the 24-hours in a day, even if the facility is operated or maintained on a 24-hour basis. (See DOE O 232.2, “Occurrence Reporting and Processing of Operations Information”)
- 4.2.5 **Annual Assessment Plan (AAP)**: A schedule of routine assessments based on facility hazard category and activity level, in the areas of Conduct of Operations, Organization and Staffing, Procedures, Maintenance, and Work Planning, Work Control, and Work Execution, Testing and Surveillances, and Occurrence Reporting. Suggested assessment

**Title: Facility Representative Program**

topics are included in Attachments A and B. The AAP is developed based on requirements contained in the IPAM.

- 4.2.6 **Deactivation**: Placing a facility in a stable and known condition including the removal of hazardous and radioactive materials to ensure adequate protection of workers, public health and safety, and the environment, thereby limiting the long-term cost of surveillance and maintenance. Actions include the removal of fuel, draining and/or de-energizing nonessential systems, removal of stored radioactive and hazardous materials, and related actions. Deactivation does not include all decontamination necessary for the dismantlement and demolition phase of decommissioning (e.g., removal of contamination remaining in the fixed structures and equipment after deactivation). (See DOE O 430.1B, “Real Property Asset Management”)
- 4.2.7 **Decommissioning**: The process of closing and securing a nuclear facility or nuclear materials storage facility to provide adequate protection from radiation exposure and to isolate radioactive contamination from the human environment. It takes place after deactivation and includes surveillance, maintenance, decontamination, and/or dismantlement. These actions are taken at the end of the life of a facility to retire it from service with adequate regard for the health and safety of workers and the public and protection of the environment. The ultimate goal of decommissioning is unrestricted release or restricted use of the site. (See DOE O 430.1B, “Real Property Asset Management”)
- 4.2.8 **Decontamination**: The removal or reduction of residual chemical, biological, or radiological contaminant and hazardous materials by mechanical, chemical or other techniques to achieve a stated objective or end condition. (See DOE O 430.1B, “Real Property Asset Management”)
- 4.2.9 **Duty Officer**: A designated individual who is on-call during non-working hours to ensure coverage 24-hours per day, and specifically assigned as the primary point of contact between DOE-SR and the Site contractors. The Duty Officer assumes the notification duties and responsibilities associated with occurrence reporting required by DOE O 232.2, “Occurrence Reporting and Processing of Operations Information.” Additionally, the Duty Officer is responsible for observing, evaluating and reporting on the Contractor’s emergency response from the event scene, The Duty Officer is required to remain fit for duty at all times, be able to answer calls for service, and to respond to the site, if necessary.
- 4.2.10 **Facility**: Any equipment, structure, system, process, or activity that fulfills a specific purpose. Examples include accelerators, storage areas, fusion research devices, nuclear reactors, production or processing plants, coal conversion plants, magneto hydrodynamic experiments, windmills, radioactive waste disposal systems and burial grounds, environmental restoration activities, testing laboratories, research laboratories, transportation activities and accommodations for analytical examinations of irradiated and

**Title: Facility Representative Program**

non-irradiated components. (See DOE O 232.2, “Occurrence Reporting and Processing of Operations Information”)

- 4.2.11 **Facility Representative (FR)**: For a major facility or group of lesser facilities, a DOE-SR employee with fulltime duties and responsibilities consisting of broad based observation and assessment of facility operations and activities considered important to maintaining the safety of workers and the public. In order to fulfill the responsibilities of a FR as delineated in DOE O 232.2, “Occurrence Reporting and Processing of Operations Information,” and DOE O 422.1, "Conduct of Operations," this individual shall maintain knowledge of facility status and conditions on a real-time basis and serve as the working level DOE-SR point of contact with the contractor.
- 4.2.12 **Facility Representative Program Sponsor**: The DOE-SR Chief Engineer is the advocate for FRs to resolve programmatic issues; guide and direct FR program implementation; and ensure FRs are effectively contributing to SRS and that line managers are effectively using their contributions.
- 4.2.13 **Integrated Performance Assurance Manual (IPAM)**: A manual that DOE-SR established to facilitate the administration of a Performance Assurance System that is effective in accomplishing mission responsibilities and performance objectives.
- 4.2.14 **FR Assessments**: Assessment functions performed by the FR usually relating to day-to-day facility operation. Assessments pertaining to conduct of operations, conduct of maintenance, work planning, work control and work execution, procedures, testing, and configuration management are examples of FR assessments. The scope and performance of these assessments are specified in Attachment B of this directive. These assessments are normally internal assessments as described in the IPAM.
- 4.2.15 **Hazard Classification**: All nuclear facilities are required to have hazard analysis covering processes, operations, or activities and should be classified in accordance with 10 Code of Federal Regulations (CFR) 830, “Nuclear Safety Management:”
- A. Category 1 Hazard - the hazard analysis shows the potential for significant offsite consequences.
  - B. Category 2 Hazard - the hazard analysis shows the potential for significant onsite consequences beyond localized consequences.
  - C. Category 3 Hazard - the hazard analysis shows the potential for only local significant consequences.
  - D. High - hazards with a potential for onsite and offsite impacts to large numbers of persons or for major impacts to the environment.

**Title: Facility Representative Program**

- E. Moderate - hazards that present considerable potential onsite impacts to people or the environment, but at most only minor offsite impacts.
- F. Low - hazards that present minor onsite and negligible offsite impacts to people and the environment.

4.2.16 **Nonreactor Nuclear Facility**: Those facilities, activities, or operations that involve, or will involve, radioactive and/or fissionable materials in such form and quantity that a nuclear or nuclear explosive hazard potentially exists to workers, the public, or the environment, but does not include accelerators and their operations and does not include activities involving only incidental use and generation of radioactive materials or radiation such as check and calibration sources, use of radioactive sources in research and experimental and analytical laboratory activities, electron microscopes, and X-ray machines. (See 10 CFR 830, "Nuclear Safety Management")

4.2.17 **Performance-Based Assessments**: Verification of procedural compliance and program effectiveness accomplished by observation and evaluation of actual work performance in the facility. A paper review of program compliance with rules and regulations does not constitute a performance-based assessment.

## 5.0 GENERAL

For the purpose of this document, Decontamination and Decommissioning activities are included when reference is made to a facility.

FRs throughout DOE-SR share common responsibilities. They provide the major onsite DOE-SR presence and the "on-the-scene eyes and ears" for DOE-SR line management. This provides increased knowledge of conditions at the facility and direct observation of the contractor's actions, thus improving DOE-SR's ability to respond quickly and effectively to facility problems.

The SRS Manager, shall ensure FRs have independent and direct access to contractor personnel, facilities, and records, as necessary, to carry out their assigned responsibilities. This is typically accomplished via a contract requirement.

Unencumbered and immediate access does not preclude FR from following industrial safety, emergency action, radiation protection, safeguards and security, or operational requirements and controls of the facility. FRs shall adhere to these requirements and controls when performing their duties.

- A. FRs shall have immediate unannounced access to every assigned facility, consistent with necessary security and safety controls. FRs shall maintain the proper clearances, training, personal protective equipment, and physical qualifications for such access.

**Title: Facility Representative Program**

- B. FRs shall have the opportunity to attend meetings, training classes, operator certification boards/examinations, etc., that contribute to the execution of the duties and responsibilities of the FR.
- C. Access to some contractor records may be limited as specified in the contract between DOE and the contractor. For example, the contract may include an item such as Department of Energy Acquisition Regulation (DEAR) 970.5204-79, "Access to and Ownership of Records" which sets forth certain categories of records which may be considered to be the property of the contractor.
- D. Safeguards and security requirements may require that more than one properly trained and cleared individual be present before independent access can be gained by DOE to some areas.

FR functions are expected to be fulltime assignments. An individual assigned solely to perform an in-depth review and assessment of a specialty area (such as radiological controls, environmental protection, emergency planning, fire protection, and physical security) is not an FR. In addition, other individuals who are in a support role may be assigned Occurrence Reporting and Processing System (ORPS) signature authority in programmatic areas, such as Construction Facilities, Environmental Safety and Health (ES&H) Programs, Government Operated Savannah River Facilities, Health Physics/Industrial Hygiene, and Safeguards, Security, and Emergency Management Services.

An FR should not have programmatic, engineering, budget, or schedule responsibilities for the facility assigned; therefore, should be in a position to provide unbiased information to DOE-SR line management. The cognizant Division Director must approve circumstances that require programmatic, engineering, budget, or schedule functions to be routinely performed by an FR.

The FR performs review and assessment of assigned facilities to ensure 1) the facilities are operated safely and conform to DOE requirements/commercial standards invoked by the contract (e.g., included in an approved Standards/Requirements Identification Document [S/RID]) and good industry practices, and 2) the contractor's operational performance, quality assurance program, and management controls are effectively implemented. In this context the FR:

- assesses performance and effectiveness of the contractor's hardware, personnel, and management program for operations;
- provides useful feedback to the contractor through the appropriate channels established by DOE-SR line management;

**Title: Facility Representative Program**

- verifies the contractor's resolution of identified deficiencies and weaknesses, including corrective actions which resulted from identification and reporting of nuclear safety non-compliances under the Price-Anderson Amendments Act of 1988; and
- coordinates with DOE-SR line management to assure acceptable closure of issues.

The FR is a key function to ensure the contractor is adequately implementing the DOE Safety Management System. This is accomplished through maintaining operational awareness of contractor work planning, work control and work execution, performing periodic assessments that evaluate implementation of the Core Functions for Integrated Safety Management, evaluating the effectiveness of the contractor's self-assessment program, and providing feedback to both the contractor and DOE Senior Management.

In performing the FR roles and responsibilities, the FR cannot replace or substitute for the contractor's management, or absolve them from their management responsibilities. Instead, the FR must assure management effectiveness. In this context the FR:

- does not dictate or manage policy to the contractor or assume responsibility for assuring safe operation;
- shall not be placed in a position of providing independent quality control inspections such as valve lineups or assuring deficiencies are promptly corrected. Random spot checks may be conducted. Deficiencies indicate a need for the contractor to increase vigilance of their conduct of operations and/or quality assurance program;
- is not the final DOE authority. The FR does not coerce the contractor action nor does the FR unilaterally exercise enforcement discretion. The FR is an official representative and spokesperson of the DOE, exercising authority consistent with DOE programs and management guidance and in a manner that is objective, factual, formal, and non-confrontational;
- is not a conduit for the transfer of information from the contractor to other DOE offices. Other DOE offices shall not bypass the required formality of order compliance or program requirements by simply utilizing the FR for obtaining information about facility operations; and
- must remain objective at all times and must not allow friendships or relationships to interfere with assessment functions. As a representative of DOE, the FR is a customer of the contractor and must maintain an "arm's length" and objective relationship in the performance of duties.

**Title: Facility Representative Program**

**6.0 PROCEDURE**

**6.1 FR PROGRAM AND QUALIFICATION**

- 6.1.1 The FR Program, at a minimum, applies to all SRS facilities meeting the definition of a Category 1, 2, or 3 Nuclear, Non-Reactor Nuclear, Radiological, or non-nuclear hazard facility.
- 6.1.2 FRs shall be qualified in accordance with Savannah River Manual (SRM) 300.1.1B, Chapter 6, Section 6.1, “Technical Qualification Program,” and DOE-Standard (STD)-1063-2011, (e.g., selection criteria and qualification cards including written and oral examinations). FR qualifications are approved by the Assistant Manager/Office Director (AM/OD).
- 6.1.3 FRs shall participate in continuing education in accordance with SRM 300.1.1B, Chapter 6, Section 6.1, “Technical Qualification Program (TQP).”
- 6.1.4 While an FR is achieving his/her full qualifications he/she may obtain Duty Officer Qualifications. The following is a list of general qualifications requirements for a Duty Officer:
  - 6.1.4.1 Be on-site in a designated position for at least six months if not previously qualified as an FR.
  - 6.1.4.2 Complete General Employee Training, General Technical Base Training, FR Fundamental Area Qualification (FAQ), Facility Entrance Training (as necessary), and Rad Worker II Training.
  - 6.1.4.3 Have a working level knowledge of all occurrence reporting requirements, including DOE Orders, EM prompt notifications, and local procedures.
  - 6.1.4.4 Have a familiarity level of knowledge of site and facility emergency response procedures.
  - 6.1.4.5 As a minimum, have a familiarity level of knowledge of safety basis documentation, and safety related systems and equipment for assigned facilities.
  - 6.1.4.6 As a minimum, complete a walkthrough with the FR supervisor or a qualified FR as delegated for the facilities for which he/she will serve as Duty Officer (DO).

**Title: Facility Representative Program**

**6.2 FACILITY REPRESENTATIVE COUNCIL (FRC)**

- 6.2.1 The FRC is chartered for the purpose of continuously improving the FR Program. A specific charter for this council has been approved and implemented. This charter defines the objectives, method of operation, membership, etc., of the FRC.
- 6.2.2 All FRs are members of the FRC. The FRC is led by the FRC Chairman, who is elected by the FRs.
- 6.2.3 Joint periodic meetings of all FRs, Facility Engineers (FEs), Safety System Oversight Engineers (SSO), and Nuclear Safety Specialists will be scheduled as necessary to disseminate and share cross-organizational information. The FRC Chairman will coordinate with the FE/SSO Chairman to arrange the meetings.
- 6.2.4 All FRs should attend the FRC meetings as well as the joint periodic meetings.

**6.3 FACILITY REPRESENTATIVE FACILITY COVERAGE**

- 6.3.1 DOE-STD-1063-2017, "Facility Representatives," contains guidelines for staffing of FRs at a facility or group of facilities. DOE-SR will follow the guidelines in DOE-STD-1063-2017.
- 6.3.2 The FRC shall appoint an FR to conduct the annual FR staffing analysis.
- 6.3.3 Division Directors from the respective organizations shall provide input to the Adjusted FR Full Time Equivalent (FTE) Coverage Level based on the factors mentioned in DOE-STD-1063-2017.
- 6.3.4 The AM/OD shall concur with the Base FR FTE Level and the Adjusted FR FTE Coverage Level or make changes as deemed appropriate. This should be completed tentatively by November each year.
- 6.3.5 The SRS Manager, DOE-SR, or designee, shall approve the completed FR staffing analysis. This should be completed prior to January 1<sup>st</sup> of the following calendar year.
- 6.3.6 The AM/OD should ensure the actual number of FRs assigned for facility coverage does not exceed the approved Adjusted Base Level FR Coverage to the extent that FR duties become less than full-time assignments for any FR.
- 6.3.7 The AM/OD should take immediate action to fill FR positions when the actual number of FRs assigned for facility coverage drops below the approved Adjusted Base Level FR Coverage.

**Title: Facility Representative Program**

**6.4 ASSESSMENT PROGRAM DEVELOPMENT**

- 6.4.1 The AM/OD shall ensure development and implementation of an Assessment Program to address assigned facilities within the organization. Refer to the IPAM for assessment program guidance.
- 6.4.2 The FR's immediate supervisor ensures assessments included in Attachment B are included in the Annual Assessment Plan, as applicable.

**6.5 FACILITY REPRESENTATIVE ASSESSMENT PERFORMANCE**

- 6.5.1 The FR's immediate supervisor ensures FR assessments contained in the annual assessment plan are completed.
- 6.5.2 The FR performs the routine assessments contained in the annual assessment plan. Activities which are not contained in the schedule (e.g., reviewing procedures for planned activities discussed at a pre-shift briefing, pursuing evolutions that are listed in the operations log to ensure the evolution proceeded properly, or investigating concerns revealed during a conversation) also should be performed by the FR. When necessary, reactive assessments may be performed in lieu of routine assessments.
- 6.5.3 The FR relies on training and experience as the basis for assessment performance. Assessment guidance contained in DOE standards/procedures, contractor procedures, or other requirement documentation should be used as necessary depending on the FR's experience level. FRs with little knowledge or experience in the subject area may develop lines of inquiry as guidance during performance of the assessment.
- 6.5.4 The FR shall observe and assess contractor activities based on parameters such as the status of the facility, the activity scheduled, its significance, and risk. The following steps apply when performing assessments:
  - A. Ensure assessment activities address procedure compliance and program effectiveness based on observations and evaluations of actual work performed in the field (e.g., performance based assessments).
  - B. Identify deficiencies based on substantiated information/evidence. Perform verification of completion of corrective actions.
  - C. Notify both DOE-SR and contractor management when deficiencies are identified that place or have the potential to place the facility in an unsafe condition.
  - D. Avoid interrupting operators in their work. Wait for opportune times to transact business. Perform observations unobtrusively to avoid diverting operators from their duties.

**Title: Facility Representative Program**

- E. Consistent contractor performance is required and necessary 24-hours per day. The FR's should perform sufficient backshift assessments to ensure consistency in the contractor's performance and should be sensitive to the element of non-predictability in performing back shift assessments. Sufficient backshift coverage shall be determined by the Division Director and shall be based on items such as the operational schedule of the facility; the complexity/risk of the operations/evolutions scheduled; the facility's performance history; the startup or restart activities; or the scheduled facility outages for modernization, modification, maintenance, or system upgrades, etc.

**6.6 FACILITY REPRESENTATIVE INTERFACE WITH SUBJECT MATTER EXPERTS (SMEs)**

6.6.1 SMEs will provide support as follows:

- A. When necessary, the FR requests support from the appropriate SME. This support may include the performance of reactive Technical Assessments, developing guidance for use by the FR during the performance of an assessment, or providing technical expertise to the FR during an investigation. The FR will normally inform the immediate supervisor when SME support is required.
- B. The FR informs the SME of the method that will be used to report assessment deficiencies. If the SME is investigating a small number of specific items or is working closely with the FR, it is appropriate for the SME to provide results to the FR without performing the reporting requirements contained in the IPAM. For reactive assessments that require an in-depth investigation, the FR and SME may determine that the results should be reported in accordance with the IPAM. The SME will immediately inform the FR of any condition that impacts safe facility operation.

6.6.2 Technical Assessment Leaders perform required assessments in accordance with the IPAM. Interface with FRs during the performance of these assessments is as follows:

- A. Prior to assessment performance, the Assessment Leader notifies the FR of the scope and schedule for the assessment.
- B. The Assessment Leader immediately informs a cognizant FR of any condition that impacts safe facility operation. All other assessment deficiencies are reported in accordance with the IPAM.

**6.7 COMMUNICATIONS**

- 6.7.1 The Cognizant Contracting Officer Representative (COR) should ensure performance feedback is conducted periodically and as necessary with contractor senior management to present the results of assessment functions. The frequency of the feedback meetings shall

**Title: Facility Representative Program**

be determined by the Cognizant COR. Additional items, such as programmatic issues, status of projects, or facility accomplishments may be discussed at the meetings as well. FRs should participate when areas of concern arise from their individual assessments.

- 6.7.2 The FR shall discuss facility status, identified deficiencies, and any substantiated or potential areas of concern with the FR's immediate supervisor on a frequent basis (normally daily).
- 6.7.3 The FR shall discuss identified areas of concern with the responsible Facility Manager. If timely and adequate response to areas of concern is not observed, the FR initiates written communications in accordance with Section 6.7.8 and/or Section 6.7.9 of this document.
- 6.7.4 Following discussion with the FR's immediate supervisor, the FR shall discuss identified deficiencies with the responsible Contractor personnel (as appropriate) to obtain acknowledgment of the deficiency prior to formal notification in accordance with Section 6.7.9 of this document.
- 6.7.5 If the responsible Facility Manager disagrees with identified deficiencies, then the FR immediate supervisor shall coordinate with the FR in preparation of the suggested resolution prior to DOE-SR management involvement.
- 6.7.6 The FR shall communicate regularly with contractor facility management and other personnel such as operators, technicians, mechanics, and engineers.
- 6.7.7 Stop Work Authority (SWO) – FRs have the authority and responsibility to issue a verbal SWO **IF** the situation is judged to be imminently dangerous to a worker, the public, or the environment. The Stop Work process is described in Savannah River Implementing Procedure (SRIP) 400, Chapter 420.1, "DOE-SR Notification to the Contractor of an Adverse Condition/Stop Work Order."
- 6.7.8 The FR's immediate supervisor shall establish a method of providing timely written notification of significant areas of concern requiring immediate attention to the contractor (i.e., memorandums, deficiency reports, surveillance reports). Written notifications should include a description of the concern and should require a written response from the contractor within a specified time period that details the actions planned or taken to resolve the concern. The approval or signature authority of the written notification should be established based on the severity of the concern.
- 6.7.9 The frequency and methods for transmitting routine written reports generated to document issues that are identified during assessment activities are specified in the IPAM.
- 6.7.10 Each FR develops input for the written reports to the contractor and DOE-SR management from their individual assessments.

**Title: Facility Representative Program**

**6.8 EMERGENCY EVENT RESPONSE AND OCCURRENCE REPORTING ACTIVITIES**

- 6.8.1 Upon discovery or notification of an abnormal event or condition, the FR performs the following:
- A. Responds to the event location or area where information about the event can be obtained.
  - B. Immediately notifies the immediate supervisor of the existence of the event or condition.
  - C. Independently obtains information pertaining to the event and assesses the event with respect to facility safety and stability.
  - D. Notifies the immediate supervisor of the conditions surrounding the event or condition, including actions taken by the contractor to stabilize the plant and/or terminate the event. Requests SMEs as necessary.
  - E. Ensure additional reporting as required by any supplemental directives and memos from headquarters and the SRS Manager are followed. Copies of these supplemental directives can be found in the FRC folder on the X: drive.
- 6.8.2 In the event of a reportable occurrence, the FR conducts occurrence-related responsibilities as follows:
- A. Responds to the facility as necessary to adequately provide review and assessment of the facility Shift Manager's actions to stabilize or return the facility/operation to a safe condition, assesses immediate corrective actions taken to minimize the impacts or prevent the recurrence of the event, and attends any meetings to gather facts or review the issue.
  - B. Verifies occurrence categorization level is correct. If the classification is not correct, request the Facility Manager to correct the classification.
  - C. Keeps DOE-SR management informed of the status of conditions.
  - D. Reviews contractor notifications and other reports, such as logs, personnel statements, and notes from investigations or meetings, in order to assess the accuracy of the information, adequacy of the root cause analysis, adequacy and timeliness of corrective actions, effectiveness of lessons learned, and timeliness of reporting.
- 6.8.3 In situations where multiple FRs within the same Division or AM organization are responsible for coverage of a single or multiple facilities, the Cognizant AM can elect to

**Title: Facility Representative Program**

utilize a Duty Officer to provide continuous FR availability for receipt of occurrence notifications and response to facility events. If the Duty Officer concept is used, the following steps apply:

- A. The FR's immediate supervisor shall ensure a Duty Officer is designated and assigned for an appropriate period. The period of assignment will normally be one week.
- B. The FR's immediate supervisor is responsible for the overall conduct of the Duty Officer. If at any time the Duty Officer's ability to perform comes under question and the FR's immediate supervisor believes that individual is not capable of performing the duties, another FR shall be assigned as Duty Officer.
- C. The FR's immediate supervisor shall ensure appropriate contractor plant and shift management is notified in writing of Duty Officer assignments, telephone numbers (work and home), pager numbers, and any pertinent information that may be useful to ensure timely notifications.
- D. When a Report Level of High is received, the Duty Officer shall notify the immediate supervisor and (if other than the Duty Officer) the FR for the facility of the details of the occurrence, as well as any required response.
- E. The Duty Officer shall be available at all times to receive all verbal notifications of abnormal events from the contractor. DO's must remain within pager range or be available by cell phone and be able to respond to the facility within about one hour.
- F. The Duty Officer shall brief the immediate supervisor and (if other than the Duty Officer) the FR for the facility each workday morning. The briefing shall consist of notifications since the last briefing, updates to information provided in the last briefing, immediate concerns, and other pertinent information.
- G. The Duty Officer immediately notifies supervision if unfit for duty so that a relief can be assigned.
- H. DO's are not permitted to perform other FR oversight duties unless they are fully qualified.

6.8.4 In accordance with DOE O 232.2A, "Occurrence Reporting and Processing of Operations Information, FRs are responsible for the following:

"Evaluate facility implementation of the notification and reporting process to ensure it is compatible with and serve the requirements of DOE O 232.2A, "Occurrence Reporting and Processing of Operations Information."

**Title: Facility Representative Program**

- A. Ensure occurrences that may have generic or programmatic implications are identified and elevated to DOE-SR management, including the Office of Safety and Quality Assurance for appropriate action.
- B. Ensure facility contractor personnel act to minimize and prevent recurrence of significant events.
- C. Review and assess reportable occurrence information from facilities under their cognizance to determine the acceptability of the Facility Manager's evaluation of the significance, causes, generic implications and corrective action implementation and closeout, and to ensure facility personnel involved in these operations perform the related functions.
- D. Ensure Occurrence Reports are prepared and transmitted in accordance with DOE information security requirements.
- E. Interact with facility personnel and DOE-SR oversight organizations as necessary and inform and advise their respective management of their findings.
- F. Elevate any unresolved issues regarding actions or determinations on a reportable occurrence to Line Management for resolution and direction.

6.8.5 Closing out and verifying occurrence reports should be performed as follows:

- A. The FR shall conduct verifications of corrective actions taken as a result of a reportable occurrence. The FR should bring long-term corrective actions to the attention of the immediate supervisor so that verifications of corrective actions can be scheduled into the Assessment Program.
- B. The FR shall ensure Facility Managers and contractors maintain the ORPS database up-to-date on the status of Final Occurrence Report corrective actions.
- C. The FR shall notify the immediate supervisor of lessons learned with generic or programmatic implications of reportable occurrences.
- D. The FR's immediate supervisor shall ensure lessons learned and generic or programmatic implications of reportable occurrences are elevated to the SRS Manager.

**6.9 SHIFT COVERAGE AND TURNOVER**

- 6.9.1 The FR's immediate supervisor may establish extended or 24-hour FR coverage based on special shift activities that require assessment coverage beyond the normal routine. Examples of special shift activities include seldom-performed activities, new activities,

**Title: Facility Representative Program**

significant movements of special nuclear material, and hazardous operations. In these cases, activities must include, but are not limited to:

- A. Development of a shift coverage plan including personnel staffing, assessment and review objectives, and other expected activities.
  - B. Development of shift schedules that provide for turnover at a time different from that of the contractor's shift turnover.
- 6.9.2 The FR may perform additional activities during periods of extended shift coverage which may include, but are not limited to:
- A. Establishing of a narrative log book to document assessment and observation activities.
  - B. A briefing by the off-going FR to the oncoming FR to include facility status, completed/current/upcoming activities, special equipment status or concerns, and notifications during shift.
  - C. Documenting coverage periods by signature, date, and time entered into the logbook by the off-going and on-coming personnel.
- 6.9.3 The oncoming FR performs a document review of the DOE Duty Officer's daily log, any shift orders, Shift Manager's log, and the Control Room Supervisor's log as a minimum.

**7.0 RECORDS**

**7.1 RECORDS CONTROL**

Records generated by this directive will be controlled and maintained according to requirements established in SRIP 200, Chapter 243.1, "Records Management Program."

**7.2 RECORDS GENERATED**

- 7.2.1 Narrative logbooks established in accordance with Section 6.9.2 A of this document.
- 7.2.2 Written reports.

**Title: Facility Representative Program**

**ATTACHMENT A  
ASSESSMENT PROGRAM GUIDELINES**

**GENERAL**

The DOE-SR Assessment Program is described in the IPAM. Philosophy of the DOE-SR Assessment Program is to ensure a balanced look at a cross section of facility activities considered important to maintaining safety. The DOE-SR Assessment Program provides routine assessments accomplishing a minimum examination of facility activities in order to confirm contractor performance and identify potential problems in early stages. In addition to routine assessments, reactive assessments are performed in areas requiring additional investigation because of discoveries during core assessments, adverse trends, past poor performance, response to abnormal events, or a safety issue communicated to the FR by a facility employee or SME. Reactive assessments also include occurrence response, issue review attendance, and verification of corrective actions.

It is the intent of the program that the routine assessments of facility operations be performed by FRs and in-depth examinations of specialty areas, such as radiological controls, environmental protection, emergency preparedness, and physical security, will be performed by Facility SMEs. Attachment B describes routine FR assessments.

The results of the assessments performed under the DOE-SR Assessment Program provide the basis for assessing facility performance by focusing the assessment process on functional technical disciplines that affect facility safety and reliability. Assessments emphasize the observation and evaluation of ongoing facility operations and supporting activities affecting the safety function of facility structures, systems, and components. These assessments also emphasize the effectiveness of program implementation and minimize detailed reviews of program descriptions and related procedures.

As a guideline, FR direct oversight activities (monitoring contractor activities, touring the facility, conducting planned assessment activities, and performing related follow-up activities) are expected to represent about two-thirds of a FR's time on an annual basis. Direct oversight activities are expected to represent about one-third of a FR-in-Training's time on an annual basis, allowing adequate time to complete initial training activities. [Administrative duties such as time spent on ORPS, personnel matters, staff meetings, etc., should be held to a minimum.] The FR Assessment Program includes routine and reactive assessments. The FR relies on training and experience as the basis for the performance of routine assessments (See Section 6.5.3).

For scheduling purposes, routine and reactive FR assessments are expected to represent about 80 percent of all FR assessment activities, but schedules should allow for flexibility. Independently initiated or unstructured assessments are expected to represent the balance of FR assessment activities. When problems with contractor performance are identified, the FR should consult with DOE management as well as SMEs. Assessments should, where applicable, be expanded to

**Title: Facility Representative Program**

**ATTACHMENT A, CONT'D**

thoroughly examine root causes and the failures in contractor management controls (including quality programs) which allow these problems to occur.

The FR shall observe, evaluate, and report on the effectiveness of the operating contractor in multiple areas important to safe, efficient operations, such as operational performance, quality assurance, management controls, emergency response readiness activities, and assurance of worker health and safety. In facilities where nuclear safeguards and security are a concern, FRs may evaluate security issues as they relate to safe operations. Additionally, the FR should evaluate the overall effectiveness of the operating contractor in implementing corrective actions to deficiencies identified by facility reviews, including corrective actions which stem from identifying, reporting, and tracking nuclear safety noncompliance under the Price-Anderson Amendments Act of 1988. When concerns are noted in any of these areas, the FR may request support or in-depth assessments from a SME (See Section 6.6.1).

FRs also perform broad-based assessments in the following areas during their routine assessment activities:

- |                                     |  |
|-------------------------------------|--|
| A. Construction                     | L. Safeguards and Security                                 |
| B. Training and Qualification       | M. Occupational Safety and Health                          |
| C. Safety Documents                 | N. Maintenance   |
| D. Environmental Protection         | O. Waste Management  |
| E. Quality Assurance                | P. Engineering and Design                                  |
| F. Radiological Controls            | Q. Configuration Control                                   |
| G. Fire Protection                  | R. Decontamination and Decommissioning                     |
| H. Emergency Preparedness           | S. Management Systems                                      |
| I. Independent Review and Oversight | T. Packaging and Transportation                            |
| J. Nuclear Safety                   | U. Environmental Restoration                               |
| K. Issue Management                 | V. Research and Development and<br>Experimental Activities |
|                                     | W. Work Planning and Control                               |

**Title: Facility Representative Program**

**ATTACHMENT B  
FACILITY REPRESENTATIVE PROGRAM GUIDANCE**

The following guidance provides the minimum routine FR oversight activities. All applicable guidance should be applied in the frequencies listed to each facility with a base level of FR coverage identified as "continual." Facilities with base level coverage lower than "continual" should be grouped such that performance of all applicable requirements can be distributed over the group of facilities on a rotating basis in the frequencies listed.

Lines of Inquiry are available on-line via the site assessment reporting program. Assessment results will also be reported on the reporting program.

**1. MAINTAIN OPERATIONAL AWARENESS**

Implementing Guidance

A. Perform a facility observation to determine current facility status.

Attend shift turnover briefing and perform control room observations as necessary to determine current facility status. Ensure all necessary information concerning facility system status is addressed. The following items may be examined to assess facility status as applicable. Routine control room examinations are normally expected to only last approximately 30 minutes.

- (1) Review control room logbook, shift supervisor logbook, tag-out logbooks, operating orders, status boards, and facility status reports to obtain information concerning operating trends and activities and to note any out-of-service safety system. Visually inspect tags on the control panels to determine their age, whether they are consistent with the lockout/tagout log, and how they impact the operators. Review the jumper/bypass log to verify there are no conflicts with Technical Safety Requirements (TSRs), the Contractor is actively pursuing correction to conditions requiring jumpers, and jumpers/bypasses have been installed and removed properly. Apparent anomalies may require follow-up to ensure adequate safety practices are followed and that appropriate corrective actions are completed. Where the use of jumpers or lifted leads results in the inoperability of safety systems, verify clear, unambiguous indication of the inoperable status of all affected systems is provided in the control room for as long as the inoperable condition exists.
- (2) Verify proper control room staffing is maintained, access to the control room is properly controlled, and operator awareness is commensurate with the facility configuration and facility activities in progress.

**Title: Facility Representative Program**

**ATTACHMENT B, CONT'D**

- (3) Verify operators are adhering to approved procedures including Abnormal or Emergency Operating Procedures, for any ongoing activity. Procedures should be of the correct revision and should be legible and complete.
- (4) Verify Contractor is operating the facility in a normal facility systems configuration as required by the TSR and, when abnormal conditions exist, that the Contractor is complying with the appropriate TSR action statements. Emphasis should be given to systems important to safety and emergency/standby electrical alignment. In addition, confirm that randomly selected valves are positioned appropriately for service and in accordance with required procedures.
- (5) Appropriate to their safety significance, observe instrumentation and recorder traces for abnormalities, including differences between channels monitoring the same parameter to detect inoperable channels and actual variations in readings that may indicate system malfunctions, apparent uncontrolled releases, etc. Verify frequency of monitoring of key process parameters by operators is sufficient to ensure proper facility, system, or equipment operation.
- (6) Verify status of selected control room annunciators and ensure control room operators understand the reasons why annunciators are lit. In addition, if an off-normal condition or false annunciation signal exists, the FR should ensure appropriate actions have been initiated to return the situation to normal and completed in a timely manner.
- (7) Examine panels containing vital monitoring instrumentation and other protection system elements to determine that required channels are operable.
- (8) Review documentation of visits to the facility and control room by the Plant Manager, Operations Supervisor, and other managers, if required by facility procedures.
- (9) Selectively review emergency system lineups, using the control room indicators, to verify parameters such as water supply and heat sink availability, as well as the operability of valves, pumps, control and indication instrumentation, and the status of other components. Also, look for indications that the system lineup meets the TSR conditions for the current facility conditions.

**Title: Facility Representative Program**

**ATTACHMENT B, CONT'D**

- (10) Verify equipment controls are in the appropriate position for current facility conditions and that key controls, if any, are in effect.
- (11) Look for indications that the TSR limits for the current facility condition are not exceeded. Examples include ventilation flows, facility heat-up or cool-down rates, system chemistry, and fluid levels. Recorded data should be reviewed for process limits such as temperature, pressure, and concentration limits.
- (12) Audit the performance of Surveillance Requirements required by TSR or facility procedures, and determines whether their results are acceptable. Examples include instrument channel checks, safety margin determinations, and calibrations.
- (13) Review effluent activity analysis and radiation monitor alarm status.

**B. Perform a facility tour.**

Tour selected portions of the accessible facility area, including Radiological Control Areas, radiation areas, contaminated areas, and exterior areas, such that the entire facility is toured on periodic basis (e.g., weekly). During shutdown conditions, tour areas not routinely accessible during operation. The FR should independently assess the safety conditions and adequacy of facility equipment, radiological controls, and security. Conduct selective examinations of the following items during the tour each day, with a goal of sampling all areas on a routine basis:

- (1) General facility/equipment conditions, including operability of standby equipment (items such as correct positioning of suction or discharge valves, leaks, etc.).
- (2) Facility areas (including cabinet interiors) for fire hazards. Examine fire alarms, extinguishing equipment, emergency lighting, actuating controls, fire-fighting equipment, fire barriers, and emergency equipment for operability.
- (3) Control of ignition sources and flammable materials.
- (4) Control of activities in progress (e.g., maintenance and surveillance). Verify these activities are being conducted in accordance with the contractor's administrative controls and they do not interfere or have the potential to interfere with the safe operation of the facility. Verify control room operators are aware of activities in progress.

**Title: Facility Representative Program**

**ATTACHMENT B, CONT'D**

- (5) Radiation protection controls:
- (a) Workers are following Radiological Control procedures (e.g., wearing required personnel dosimetry properly, using protective clothing, properly frisking upon exiting a radiologically controlled area). Radiation areas are properly posted.
  - (b) Examine randomly selected radiation protection instruments that are in use to verify operability and adherence to calibration frequency. Instruments should include portable instruments, area monitors, friskers, and counting equipment.

**NOTE:** Questions concerning judgment of the adequacy of the above should be discussed with the Radiological Controls staff.

- (6) Occupational Safety and Health control of hazards. Ensure hazards are properly posted and/or barricaded where required. Ensure personnel are utilizing the required personnel safety equipment (hard hats, safety glasses, hearing protection, etc.).
- (7) Security program plans are being implemented as evidenced by random assessments of the following:
- (a) All persons within the secured area are required to display proper photo identification badges; those requiring an escort are properly escorted.
  - (b) Security area portals are kept locked and alarmed as prescribed by procedure (or adequate compensatory measures are in place).
  - (c) Personnel and packages entering the secured area at the primary access portal are searched by hand or by appropriate search equipment.
  - (d) Unprotected classified or sensitive unclassified information is not present in unoccupied areas.
  - (e) Security doors and barriers operate properly and personnel are not tailgating into facilities or areas.
  - (f) Any unauthorized electronic equipment noted during tours is brought to the attention of the security representative.
  - (g) Lengthy establishment of compensatory security posts would be noted; underlying maintenance issues resulting in compensatory measures would be brought to the attention of the Office of Safeguards, Security, and Emergency Services (OSSES) Security Specialist for resolution.
  - (h) Unsafe lighting conditions noted during backshift tours would be brought to the attention of the OSSES Security Specialist for resolution.
  - (i) Tamper Indicating Devices are periodically inspected and their integrity is validated.
  - (j) The two-person rule is in effect and enforced, where applicable.
  - (k) For shipments and receipts of Special Nuclear Material, transfer documentation is periodically reviewed for adequacy.
  - (l) Attentiveness of Protective Forces.

**Title: Facility Representative Program**

**ATTACHMENT B, CONT'D**

- (8) Control of facility housekeeping conditions/cleanliness.
- (9) Facility areas for missile hazards caused by improper or unauthorized handling or storage of portable gas cylinders that could cause unacceptable damage to equipment with safety significance.
- (10) Nuclear Safety: As a minimum, verify controls are in place to ensure proper facility, system, or equipment status with regards to criticality safety.

**2. ROUTINE ASSESSMENTS**

**A. Perform an Operational Awareness observation**

Observe overall site/facility status or activity status, major changes planned, and overall safety posture. Activities include routine day-to-day monitoring of work performance through site/facility tours/walkthroughs, work observation, document/log reviews, meeting attendance and participation, and ongoing interaction with contractor workers, support staff, and management.

**B. Perform an operations activity observation.**

Observe an operations activity (e.g., valve lineup, system startup/shutdown, operator rounds) throughout the preparation and execution. Ensure a pre-job brief is conducted when required, procedures are followed, communications are acceptable, and proper precautions are observed throughout the operations activity.

**C. Perform a surveillance requirement observation.**

Observe a Surveillance Requirement activity throughout the preparation and execution. Ensure a pre-test brief is conducted when required, procedures are followed, communications are acceptable, acceptance criteria are met, and proper precautions are observed throughout the activity.

**D. Perform a work planning/work control/work execution activity observation.**

Observe WP&C and work execution activities, as well as a maintenance activity on a major component. Ensure adequate lockout/tagouts are utilized, procedures are followed, and requirements are met. See DOE O 433.1B, "Maintenance Management Program for DOE Nuclear Facilities," for more details or refer to the site assessment program for Lines of Inquiry.

**Title: Facility Representative Program**

**ATTACHMENT B, CONT'D**

**3. ANNUAL ASSESSMENT ITEM**

A. Perform an assessment of the contractor's Occurrence Reporting Program.

Verify contractor's notification and reporting of occurrences are compatible with and serve the policies of DOE O 232.2A, "Environment, Safety, and Health Reporting." Examine for trends as well as timeliness and adequacy of classifications, notifications, and corrective actions. Review the latest revisions of the contractor's notification procedures to ensure compliance with the intent of the order.