## Revision change log

<table>
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<tr>
<th>Revision</th>
<th>Section</th>
<th>Description</th>
<th>Date</th>
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<tr>
<td>0</td>
<td></td>
<td>Initial issuance.</td>
<td>Aug. 2009</td>
</tr>
<tr>
<td>1</td>
<td>All</td>
<td>Complete re-write.</td>
<td>Mar. 2010</td>
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Oversight Program Plan

CONCURRENCE:

Nuclear Safety Oversight Lead

Quality Assurance Lead

APPROVAL:

Manager or designee
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1.0 Purpose

The purpose of this Oversight Program Plan (OPP) is to describe the Portsmouth/Paducah Project Office (PPPO) implementation of the U.S. Department of Energy (DOE) oversight policy as established by DOE P 226.1A, Department of Energy Oversight Policy and DOE O 226.1A, Implementation of Department of Energy Oversight Policy. The OPP describes the various oversight methods used, how they are used, and how the results of the various methods are integrated and considered as a whole to give an accurate oversight picture. The OPP identifies the program areas to be reviewed, the periodicity of reviews, the reviews necessary to maintain the baseline oversight program, the qualifications of review personnel, and the source of review criteria.

2.0 Applicability

2.1 This OPP applies to all projects managed by the U.S. Department of Energy (DOE) Portsmouth/Paducah Project Office (PPPO), including projects managed by its Operations Group in Lexington, Kentucky and its Operations Oversight Groups in Piketon, Ohio, and Paducah, Kentucky.

2.2 The OPP applies to PPPO federal staff and support service contractors (SSCs).

2.3 The PPPO Management Plan describes the oversight for all PPPO assurance systems.

2.3.1 Oversight conducted by PPPO and SSC personnel on PPPO programs, processes, and procedures constitute the self-assessment (internal) program. These are included in the Annual Assessment Schedule as Management Assessments in accordance with PPPO-M-414.1-2, Assessment and Surveillance Process. Management assessments are conducted by line management or on behalf of line management by the QA organization.

2.3.2 PPPO conducts independent oversight of contractors. DOE Headquarters and other DOE organizations (e.g., Environmental Management Consolidated Business Center) provide independent (external) oversight of PPPO.

2.4 The OPP supplements the overall PPPO Oversight Program established by the PPPO Management Plan and described in an integrated set of established programs as described below. These individual programs (and their associated plans and procedures) are referred to collectively as Implementing Programs in this procedure.

- PPPO-M-413.1-1, Management Plan (MP) – The PPPO Management Plan serves as the Functions, Responsibilities, and Authorities (FRA) implementing document, the project management and strategic plans, and the Integrated
Safety Management System (ISMS) description. Line authority, responsibility, and accountability for management assessment of contractor activities flows from Environmental Management (EM) to the PPPO Manager, who is responsible for day-to-day assessment of all program operations. Oversight of all PPPO and contractor project execution systems is addressed by the PPPO Management Plan.

- PPPO-M-414.1A, U.S. Department of Energy Portsmouth/Paducah Project Office Quality Assurance Program Plan (QAPP) – The QAPP describes how PPPO establishes, implements, and maintains an effective Quality Assurance (QA) program that supports compliance with applicable Federal, State and local regulations and DOE Orders (O) and requirements. The criteria of 10 CFR 830.120, Quality Assurance, and DOE O 414.1C, Quality Assurance, (or latest version) and the American Society of Mechanical Engineers' (ASME) nuclear quality assurance (NQA)-1-2004 and addenda through 2007, Quality Assurance Program Requirements for Nuclear Facilities, (hereafter referred to as NQA-1) are used to provide a quality management system for accomplishing and assessing DOE work in accordance with requirements. The Office of Environmental Management Headquarters Quality Assurance Program Plan (EM-QA-001) (EM QAP) provides additional interpretation and communication of the application of these requirements. The PPPO QA system is compliant with and integrated with the Safety Management System (SMS) required by DOE Policy (P) 450.4, Safety Management System (SMS) Policy, and the Environmental Management System (EMS) required by DOE O 450.1, Environmental Protection Program. The quality management system provides processes and tools for ensuring that the integrated SMS achieves its objectives.

- PPPO-1063, Facility Representative Program Plan (FRPP) – The FRPP defines roles, responsibilities, and performance requirements for the PPPO Facility Representatives (FRs), as well as their relationships with other PPPO staff and with the site contractors. The FRPP establishes the framework for the PPPO FR Program and defines roles and responsibilities, duties, reporting requirements, interfaces, and overall philosophy for implementing the program. It defines the selection, training, and qualification requirements including mechanisms to measure knowledge, skills and abilities of FRs leading to formal certification and provides for periodic re-qualification of all FRs.

- PPPO-M-420.1-3, Safety Systems Oversight Program Plan (SSOPP) - The SSOPP contains the administrative instructions for implementing the PPPO Safety Systems Oversight (SSO) program. The Program Plan defines roles, responsibilities, and performance requirements for the PPPO SSO Engineers, as well as their relationships with other PPPO staff and with the site contractors. Establishes the framework for the PPPO SSO Program and defines roles and responsibilities, reporting requirements, interfaces, and overall philosophy for implementing the program. Defines the selection, training, and qualification requirements including mechanisms to measure knowledge, skills, and abilities of SSO Engineers leading to formal initial qualification and provides for requalification, as necessary, of the SSO Engineers.
• Safeguards and Security Program – PPPO has established an assessment program for safeguards and security (S&S) for PPPO federal and contractor activities. S&S assessments are addressed by PPPO Self Assessment Security Procedure 1.2 and PPPO Resolving Self Assessment and Surveillance Findings 1.3.

• PPPO Cyber Security Program – PPPO has established an assessment program for cyber security for the federal and contractor cyber security boundaries. This program is driven by the requirements in the Under Secretary of Energy Program Cyber Security Plan (PCSP). The PCSP contains controls and requirements that use and enhance the guidelines defined in NIST SP 800-53 as directed by DOE O 205.1A. These controls are met by contractors and federal oversight providing annual security assessments on their respective boundaries and EM HQ Mission Information Protection Program (MIPP) team site assessment visits. All of the assessments are based on a risk management methodology and tracked in the EM HQ Risk Portfolio Manager (RPM) system.

3.0 References and Definitions

3.1 References
(Note: Latest revisions unless otherwise specified)

• American Society of Mechanical Engineers Nuclear Quality Assurance (NQA)-1, Quality Assurance Requirements for Nuclear Facilities, 2004 and Addenda through 2007

• 10 Code of Federal Regulations (CFR) 830, Subpart A, Quality Assurance

• 10 CFR 830, Nuclear Safety Management Rule

• 10 CFR 851, Worker Health and Safety Program Rule

• DOE O 205.1A, Department of Energy Cyber Security Management Program

• DOE Order (O) 226.1A, Implementation of Department of Energy Oversight Policy, U.S. Department of Energy

• DOE O 151.1C, Comprehensive Emergency Management System, Chapter X, “Readiness Assurance”

• DOE Policy (P) 226.1A, Department of Energy Oversight Policy

• DOE O 413.3A Chg 1, Program and Project Management for the Acquisition of Capital Assets

• DOE O 414.1C, Quality Assurance

• DOE O 420.1B, Facility Safety

• DOE O 425.1C, Startup and Restart of Nuclear Facilities

• DOE Manual (M) 450.4-1, Integrated Safety Management System Manual

• DOE M 442.1-1, Differing Professional Opinions Manual for Technical Issues Involving Environment, Safety and Health

• DOE P 442.1, Differing Professional Opinions on Technical Issues Related to Environment, Safety, and Health
3.2 Definitions

- **Assurance Systems** (DOE P 226.1A) – All aspects of the processes and activities designed to identify deficiencies and opportunities for improvement, report deficiencies to the responsible managers, complete corrective actions, and share in lessons learned effectively across all aspects of operation.

- **DOE Oversight** (DOE P 226.1A) – Activities performed by DOE organizations to determine whether Federal and contractor programs and management systems, including assurance and oversight systems, are performing effectively and/or complying with DOE requirements. Oversight programs include operational awareness activities, onsite reviews,
assessments, self-assessments, performance evaluations, and other activities that involve evaluation of contractor organizations and Federal organizations that manage or operate DOE sites, facilities, or operations.

- **Implementing Program Lead** – The PPPO employee assigned primary responsibility for execution of one of the PPPO assurance programs as listed in Section 2.5. An Implementing Program Lead may become the Responsible Organization Lead for conditions adverse to quality identified for their program or project.

- **Independent Assessment** – An assessment, as defined by 10 CFR 830 Subpart A, NQA-1, DOE O 414.1C, conducted by individuals within the organization or company but independent from the work or process being evaluated, or by individuals from an external organization or company. For PPPO, independent assessments are those conducted by PPPO on contractors (internal) and those conducted by DOE Headquarters or other outside organizations on PPPO activities (external).

- **Management Assessment** – An assessment, as defined by 10 CFR 830 Subpart A, NQA-1, and DOE O 414.1C, on PPPO activities to identify the management systems, processes, and programs that affect performance and to make improvements. The emphasis of management assessment is on issues that affect performance, strategic planning, personnel qualification and training, staffing and skills mix, communication, cost control, organization interfaces, and mission objectives. For PPPO, management assessments may be conducted by line managers on their project or may be conducted by another PPPO group (e.g., QA) on behalf of the line manager.

- **Monitoring** – Verifying performance and compliance requirements and expectations through, but not limited to, surveillance, evaluations, reviews, interviews, discussions, and observations.

- **Oversight** – The process of independent assessment of performance and compliance with applicable requirements (e.g., statutes, laws, DOE orders, and policies) and may consist of audits, reviews, appraisals, evaluations, observations, interviews, or any other assessment technique which produces documented information and measurements. DOE ensures the compliance of federal employees by self-assessment and by assessment by other outside agents.

- **Responsible Organization Lead** – The senior federal employee held responsible and accountable for successfully developing, safely executing, and managing the DOE projects and functions.

- **Subject Matter Expert (SME)** – A Subject Matter Expert is a person having extensive education, experience, and/or knowledge of a particular subject area.
• **Subject Matter Lead (SML)** – The Subject Matter Lead is the PPPO staff member designated by PPPO as the primary point of contact for questions and issue resolution in their assigned area.

### 4.0 Roles and Responsibilities

The roles and responsibilities provided in this section are in addition to the specific roles and responsibilities assigned to these positions in the individual Implementing Programs as described in Section 4.0 below.

#### 4.1 PPPO Manager or Designee

4.1.1 Ensure adequate resources are identified and applied to effectively implement the PPPO Oversight Program.

4.1.2 Periodically evaluate the effectiveness of the Oversight Program and pursue changes, as necessary, to improve overall performance and effectiveness.

4.1.3 Provide feedback to DOE Headquarters on the PPPO Oversight Program activities and results, as appropriate.

4.1.4 Coordinate any requested exemptions to DOE O 226.1A in accordance with DOE M 251.1-1B.

4.1.5 Provide unfettered access to information and facilities to conduct an effective oversight program, consistent with applicable laws and requirements.

4.1.6 Review and approve contractor assurance system program descriptions.

4.1.7 Provide direction to the Nuclear Safety Oversight Lead (NSOL) on Oversight Program priorities and focus areas.

4.1.8 Ensure personnel assigned responsibility for the Oversight Program possess the experience, knowledge, skills, and abilities commensurate with their responsibilities.

4.1.9 Ensure Implementing Oversight Programs and procedures are adequately maintained and appropriate resources are applied to support the PPPO Oversight Program goals and priorities.

4.1.10 Approve the Oversight Program Annual Assessment Schedule, and associated goals, priorities, and feedback mechanisms.

#### 4.2 Nuclear Safety Oversight Lead

4.2.1 Serve as the PPPO lead for the Oversight Program as it relates to safety systems, excluding the individual Implementing Programs.
4.2.2 Maintain and oversee the Implementing Oversight Programs as assigned by the Manager.

4.2.3 Develop, in conjunction with the Responsible Organization Leads, Oversight Program goals and feedback mechanisms (e.g., performance indicators and measures) based on PPPO priorities.

4.2.4 With the QA Lead, develop the Annual Assessment Schedule.

4.2.5 Oversee and provide technical support for the site nuclear safety systems and oversee nuclear and non-nuclear facility operations at the Portsmouth and Paducah sites.

4.2.6 Communicate Oversight Program metrics, results, and accomplishments to the PPPO organization.

4.2.7 Develop and maintain the SME list for PPPO, and ensure the identification of SMLs.

4.3 Responsible Organization Lead

4.3.1 Provide resources to support the implementation of the Oversight Program.

4.3.2 Communicate areas requiring additional oversight to the Implementing Program Leads.

4.3.3 Provide input to the Annual Assessment Schedule.

4.3.4 Review, approve, and implement corrective actions developed in response to issues identified by the Oversight Program.

4.3.5 Ensure the timely completion of accepted corrective actions developed in response to issues identified by the Oversight Program.

4.3.6 Ensure corrective actions developed to address issues identified by the Oversight Program are appropriate to address issues and support continuous process improvement, and coordinate tracking and closure with the QA Lead.

4.4 Implementing Program Leads

(Note: Refer to definitions.)

4.4.1 Identify specific areas for additional oversight and make recommendations to the Oversight Program Lead and Responsible Organization Lead.

4.4.2 Conduct reviews, assessments, and surveillances in accordance with the Implementing Program requirements and approved Annual Assessment Schedule.
4.4.3 Ensure PPPO personnel assigned to support the Oversight Program are appropriately trained and qualified.

4.4.4 Coordinate independent oversight activities conducted by DOE Headquarters or other external organizations with the QA Lead and Oversight Program Lead, as appropriate.

4.4.5 Provide Implementing Program requirements for flow down into the prime contracts to the Contracting Officer.

5.0 Requirements

5.1 Program Areas to Be Reviewed

5.1.1 The PPPO has developed the following eight key Focus Areas of project execution for evaluation under the Oversight Program:

- Integrated Safety Management System/Environmental Management System
- Quality Assurance (including NQA-1)
- Project Management
- Facility Operations (Environmental Remediation, Decontamination and Decommissioning, Waste Management, Infrastructure Surveillance and Maintenance)
- Facility Safety (including Safety Basis and Emergency Management)
- Radiation Protection and Authorized Limits
- Safeguards and Security
- Operational Readiness

5.1.2 Each of these Focus Areas has multiple supporting functions that require oversight to comply with regulations and DOE requirements, and to ensure effective and efficient implementation of the PPPO mission. The functions are utilized during the development of the Annual Assessment Schedule to ensure that required oversight is completed.

5.1.3 Supporting functions may be the focus for specific oversight or may be incorporated into the review criteria.

5.2 Frequency of Reviews

5.2.1 Each of the Focus Areas is evaluated once every three years at a minimum, with more frequent evaluation as recommended by the Responsible Organization Leads and Implementing Program Leads, and as approved by PPPO management.

5.2.2 Focus Area evaluations are conducted as assessments in accordance with the QAPP and PPPO-M-414.1-3, Assessment, and Surveillance Process.
5.2.3 Supporting functions are subject to evaluation as part of the Focus Area reviews; individual assessments or surveillances; or field observations through the Implementing Programs.

5.3 Annual Assessment Schedule

5.3.1 The NSOL and QA Lead develop a draft Annual Assessment schedule at the beginning of each fiscal year (FY). Focus Area and supporting function assessments are included as appropriate to ensure PPPO complies with reviews required by regulations and requirements. These assessments make up the “Core” or baseline schedule that is tracked by the PPPO Lexington Program Analyst and reported to DOE Headquarters.

5.3.2 The schedule is submitted to the Responsible Organization Leads and Implementing Program Leads for input. Additional assessments and surveillances that are identified by the Responsible Organization Leads and Implementing Program Leads are included in the “Supplemental” assessment.

5.3.3 Once finalized, the NSOL and QA Lead concur on the Core Annual Assessment Schedule and submit it to the PPPO Manager for approval.

5.3.4 The approved Core Annual Assessment Schedule is submitted to DOE Headquarters.

5.4 Qualifications of Oversight Personnel

5.4.1 Qualifications of Federal oversight personnel are established by the Implementing Programs.

5.4.2 Qualification of SSC personnel used to supplement Federal oversight staff is determined by the NSOL in conjunction with the Responsible Organization Lead.

5.4.2.1 PPPO specifies when SSC personnel are brought in to support the Oversight Program.

5.4.2.2 PPPO determines the specific skills, subject matter expertise, experience, training, and or qualifications that are needed to support the existing projects and activities.

5.4.2.3 The SSC is directed to locate personnel that meet the PPPO needs.

5.4.2.4 Once SSC oversight personnel are approved by PPPO and hired, the NSOL or designee identifies additional, site-specific training and/or qualifications necessary to ensure access to site facilities and activities and ensure effective oversight of the assigned work.

5.4.2.5 The NSOL verifies completion of training of SSC personnel.
5.4.2.6 SSC oversight personnel work under the direction of the NSOL, designated Facility Representative(s), and/or other Federal employees.

5.4.3 Federal and SSC personnel supporting the Oversight Program receive training and/or certification through programs such as:

- Office of Personnel Management Qualification Standards
- Project Management Career Development Program
- PPPO Technical Qualification Program
- PPPO Facility Representative Qualification Program
- PPPO Safety Systems Oversight Qualification Program
- American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA)-1 Auditor/Lead Auditor Certification
- Site specific training requirements
- Professional society certifications

5.4.4 The NSOL maintains a list of SMEs for PPPO. The SME list is reviewed and approved by the Manager. SMEs are identified for the supporting functions.

5.4.5 PPPO obtains additional SME resources as necessary from within DOE (e.g., Environmental Management Consolidated Business Center) or from SSCs.

5.4.6 SSC personnel requested who support the Oversight Program activities may be subject to the federal qualification program requirements. The NSOL, Responsible Organization Lead, and/or Implementing Program Lead reviews and evaluates SSC personnel competence and determines the need for any additional training.

5.5 Review Criteria

5.5.1 Review criteria for conduct of oversight are based on the applicable regulations, DOE requirements (i.e., orders, manuals, standards), approved PPPO programs and procedures (for management assessments), and contracts and contractor programs and procedures (for oversight of contractors).

5.5.2 Review criteria can range from formal Criteria Review and Approach Documents (CRADs) through simple checklists.

5.5.3 Oversight conducted as formal assessments through the applicable Implementing Program involve pre-determined review criteria and are documented in a formal report.

5.5.4 When not available, CRADs or checklists may be developed with the assistance of the Implementing Program Lead.

5.5.5 All review criteria are reviewed and approved by the Responsible Organization Lead prior to conduct of the assessment.
6.0 Conduct of Oversight

6.1 Oversight Methods

6.1.1 PPPO uses a variety of oversight methods for both management (self) assessment and independent (contractor) assessment, many of which are defined in the Implementing Program plans.

6.1.2 Oversight is tailored to the activity or area of concern based on a systematic analysis of hazards, risks, and past performance of organizations, programs, and facilities, including previous oversight results. Oversight can range from a comprehensive review of a program (e.g., ISMS) to field observations of specific work activities.

6.1.3 Oversight methods include:
- Project performance reviews
- Formal assessments and audits
- Surveillances
- Monitoring
- Operational start-up reviews and assessments
- Document reviews
- Field observations
- Walk-throughs
- Interviews
- Discussions
- Exercise participation (e.g., Emergency Management)

6.2 Feedback and Continuous Improvement

6.2.1 The key Focus Areas may be expanded, reduced, or modified by the PPPO Manager based on the recommendations of the Responsible Organization Leads and Implementing Program Leads.

6.2.2 In addition, program priority changes, scope changes due to changing site conditions or DOE missions, contractor or contractor performance changes, and other criteria are utilized to optimize the Focus Area list and to identify priorities for examination of the Focus Areas.

6.2.3 Oversight activities may also be adjusted based on the results of previous management and independent oversight results. Corrective actions may include follow-up verification oversight.

6.2.4 Review of DOE-distributed or internal lessons learned are also considered.

6.2.5 The results of this continuous improvement process are reflected in the Annual Assessment Schedule.
6.3 Reporting

6.3.1 Specific reporting processes are defined in each of the Implementing Programs.

6.3.2 Where specific PPPO programs are not established, reporting is conducted in accordance with the applicable DOE directive (e.g., reporting for accident/incident investigations).

6.3.3 In addition to these established reporting mechanisms, additional reporting is accomplished through memoranda to HQ, as applicable; discussions in the Integrated Project Team meetings as documented in the meeting minutes; letters to the prime contractors; submittals to PPPO from the SSCs; and other documents as determined necessary by the NSOL, Responsible Organization Leads, and/or Implementing Program Leads.

6.4 Differing Opinions

6.4.1 PPPO supports the resolution of disputes (e.g., differing opinions) on environment, safety, and health issues between assessed and assessing employees or organizations at the lowest possible organizational level.

6.4.2 If informal discussions successfully resolve the dispute, the resolution should be documented in a mutually agreeable way.

6.4.3 If the dispute cannot be resolved in informal discussions, it should be elevated to the minimum extent necessary to reach resolution through the organizational hierarchy.

6.4.4 If agreement cannot be reached, persons who disagree may document a differing opinion in accordance with DOE P 442.1, Differing Professional Opinions on Technical Issues Related to Environment, Safety, and Health.

6.4.5 PPPO federal personnel may also submit the issue as an employee concern in accordance with PPPO-M-442.1-1, Processing of Employee Concerns. Contractors may submit concerns through the contractor’s employee concern program or directly to PPPO.

6.5 Issues and Corrective Actions

6.5.1 PPPO issues identified through the Oversight Program by management assessments or independent assessments by DOE HQ are managed and tracked in accordance with the PPPO-M-414.1-1, Corrective Action Program.

6.5.2 Corrective actions are developed and assigned by the Responsible Organization Lead to appropriate personnel.

6.5.3 PPPO corrective actions are tracked to closure in a database. Contractors are responsible for tracking issues identified by PPPO oversight activities,
and provide regular updates to PPPO for inclusion in the database, which allows PPPO to follow contractor corrective actions to closure.

6.6 Performance Indicators

6.6.1 The PPPO Performance Indicators are reported as described by the Implementing Program Plans, as applicable (e.g., performance measures for budget execution discussed in the PPPO Management Plan).

6.6.2 The NSOL coordinates development of additional performance indicators with the Responsible Organization Leads and Implementing Program Leads.

6.6.3 The MTS may be utilized to develop trend reports and performance indicators.

6.6.4 Performance indicators will be created, reviewed, and revised, as appropriate, as the Oversight Program continues to mature.

7.0 Records

Records generated by the Oversight Program are specified in the Implementing Programs and procedures and managed in accordance with the PPPO Records Management Program.