

## Management System: Quality Assurance and Oversight

## Subject Area: Quality Oversight and Assessments

# Procedure: Assessment/Management Assessment and Oversight

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### 1.0 Applicability

This procedure applies to all Assessment/Management Assessments and Oversight activities performed by the Environmental Management Consolidated Business Center (EMCBC) and participating Small Sites. This procedure meets the requirements of EM-QA-001 *EM Quality Assurance Program (QAP)* and DOE Order 414.1D, *Quality Assurance Criteria 10, Assessment/Management Assessments*. Assessment/Management Assessments also use guidance provided in DOE G 414.1 1B, *Management Assessment and Independent Assessment Guide*. In addition, this procedure meets the requirements of DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*. Federal Line Management Oversight (Operational Oversight) should use the guidance established in DOE G 226.1-2, *Federal Line Management Oversight of Department of Energy Nuclear Facilities* and in *DOE-STD-1063-2011 Facility Representatives*.

#### Assessment / Management Assessments Requirements

Individuals or a group of Line Managers or personnel knowledgeable in the subject areas to be assessed may lead or assist in performing Assessment/Management Assessments. The primary responsibility of these activities is to evaluate contractor and DOE programs and management systems, including site assurance systems, for effectiveness of performance (including compliance with requirements) and to identify barriers or opportunities to improve performance. Assessments can be a review, an evaluation, an inspection, a test, a check, a surveillance, or self-assessment to determine and document whether items, processes, systems, or services meet specified requirements and perform effectively or could be modified to improve efficiency.

DOE G 414.1-1B , *Management and Independent Assessments Guide*, recommends that both management and independent assessments be performed by qualified individuals who are knowledgeable about the program, system, or process being assessed and have been trained to ensure full understanding of the assessment processes, including reporting. The EMCBC tailors this recommendation based on the size and complexity of the Assessment/Management Assessment but at a minimum, individuals should be knowledgeable about the program, system, or process being assessed.

## Oversight Requirements

Line Management, Facility Representatives and personnel knowledgeable in the subject areas to be assessed perform Day to-Day Operational Awareness and Oversight activities. These personnel 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. 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.

DOE O 226.1B requires that DOE organizations maintain sufficient technical capability and knowledge of site and contractor activities to make informed decisions about hazards, risks, and resource allocation; provide direction to contractors; and evaluate contractor performance.

Facility Representatives are trained in accordance with Core qualification requirements presented in DOE-STD-1146 and DOE-STD-1151 and site specific criteria established by Field Element Managers. Additional training and qualification requirements apply to defense nuclear facilities. These include the regulations set out in DOE O 426.1, Chg. 1, Federal Technical Capability, which applies only to Federal personnel. This directive provides specific requirements for qualification programs for Facility Representatives, Safety System Oversight (SSO) personnel, and senior technical safety managers (STSMs). DOE O 360.1C, Federal Employee Training, establishes requirements for training of Federal personnel.

## Assessment /Management Assessments and Oversight Formality and Scope

The level of formality and scope of Assessment/Management Assessments and Oversight can vary greatly. For example, as an informal assessment, a line manager, may evaluate the skills of personnel involved in the performance of a single work function and could document the need for additional training or staffing level adjustments through a simple memorandum. On the other hand, at the more formal extreme, an assessment team may be composed of senior line managers, Facility Representatives, personnel knowledgeable in the subject areas and process consultants from outside the organization. This Team could perform an extensive evaluation of an entire organization using checklists, interviews, document reviews, work observations, and evaluation by objective evidence, followed by the issuance of a formal report.

## 2.0 Required Procedure

<b>ASSESSMENT/MANAGEMENT ASSESSMENT AND OVERSIGHT PLANNING</b>	
<b>Step 1</b>	The EMCBC Director, EMCBC Assistant Directors, or Small Site Senior DOE Officials establish Assessment schedules but maintain flexibility in order to meet operational and management needs. These schedules provide the method for selecting the type, number, and frequency of routine operational awareness activities and identify the personnel responsible for these assessments. Schedules are reviewed and updated on a regular basis to ensure relevance.

	<p><b>Note:</b> Oversight activities do not typically involve formal schedules for day-to-day oversight. Oversight activities should vary day-to-day to show a degree of unpredictability and spontaneity based on judgment regarding what is appropriate to observe and assess.</p>
<b>Step 2</b>	The Assessment Lead reviews the scope of the oversight activity and reviews applicable requirements, and implementing documents.
<b>Step 3</b>	The Assessment Lead selects an appropriate number of potential Assessment Team Members (if necessary) who collectively have experience or training commensurate with the scope, complexity, or special nature of the work requiring assessment or oversight.
<b>ASSESSMENT AND OVERSIGHT PERFORMANCE</b>	
<b>Step 4</b>	<p>Line Managers, Facility Representatives, or personnel knowledgeable in the subject areas to be assessed evaluate the work activity against the requirements by using the guidance provided in DOE G 414.1 1B, <i>Management Assessment and Independent Assessment</i> and documents the activity on the Assessment/Management Assessment and Oversight Report Form:</p> <p><b>Note:</b> Every worker has the right to stop work when they discover any exposure to imminently dangerous conditions or serious hazards. If an employee discovers such conditions, they should stop the work, notify the Facility Manager, EMCBC Director or Small Site Senior DOE Official, and then refer to the EMCBC Stop Work Procedure.</p>
<b>Step 5</b>	<p>Line Managers, Facility Representatives, and or personnel knowledgeable in the subject areas identify and document Issues on the Assessment/Management Assessment and Oversight Report Form:.</p> <p>Identify issues that represent potential safety or quality concerns, process improvement opportunities, deviations from requirements, or any other issues worthy of management attention. Issues should be graded as follows and entered into a formal corrective action system if they are considered Significant Deficiencies or Deficiencies.</p> <p><b>Significant Deficiencies:</b> Issues that if left uncorrected, could have a serious effect on the environment, safety, health, security, or operational integrity. This includes Concerns and Significant Conditions Adverse to Quality.</p> <p><b>Deficiencies:</b> Issues that represent non-compliances with procedural, contractual or regulatory requirements. This includes Findings and Conditions Adverse to Quality and inadequacies or safety issues that warrant a management attention.</p> <p><b>Observation:</b> Issues that do not meet the definition of a deficiency. . This</p>

	includes comments, observations, opportunities for improvement, and noteworthy practices.
<b>ASSESSMENT AND OVERSIGHT REPORTING ACTIVITIES (CONTRACTOR ACTIVITIES)</b>	
<b>Step 6</b>	The Assessment Lead shall complete Assessment/Management Assessment and Oversight Report Form. In addition, the Assessment Lead prepares Issues Transmittal Forms for all Significant Deficiencies, Deficiencies, and/or Observations and provides the form to the Responsible Manager for transmittal.
<b>Step 7</b>	The Responsible Manager transmits the issues to the Contractor under cover letter and provides copy to the Contracting Officer and/or Contracting Officer Representative. The letter shall require Contractor Corrective Action Plans (CAPs) for each Significant Deficiency and Deficiency identified. DOE approval is required for all Significant Deficiencies identified.
<b>Step 8</b>	CAPs shall be tracked to closure by the Contractor and verified closed by a representative of the DOE.
<b>ASSESSMENT AND OVERSIGHT REPORTING ACTIVITIES (DOE ACTIVITIES)</b>	
<b>Step 9</b>	The Assessment Lead shall, complete and forward a copy of the Assessment/Management Assessment and Oversight Report Form to the Responsible Managers and provide a copy to the Corrective Action Coordinator. If Significant Deficiencies and Deficiencies are discovered the Assessment Lead shall provide copies to the EMCBC Director, Deputy Director and responsible Assistant Director. Corrective actions are required for each
<b>Step 10</b>	The Responsible Manager shall process Significant Deficiencies and Deficiencies using the EMCBC Corrective Action Procedure.
<b>POST ASSESSMENT ACTIVITIES</b>	
<b>Step 11</b>	Assessment Lead shall submit Lessons Learned (if any) to the EMCBC Lessons Learned Coordinator for distribution.
<b>Step 12</b>	The Assessment Lead shall, provide the original signed copy of the Assessment/Management Assessment and Oversight Report Form to the EMCBC QA Records Custodian or Site Records Coordinator for processing in accordance with Section 4, Records Generation.  NOTE: If Oversight Reports are maintained electronically, Facility Representative or SMEs shall work the EMCBC or Small Site Records Management Field Officer (RMFO) to ensure they are managed appropriately.

### 3.0 References – Forms/Attachments/Exhibits

- Form 1 - Assessment/Management Assessment and Oversight Report Form:
- Form 2 - Issue Transmittal Form

## 4.0 Records Generation

Records generated through implementation of this procedure are identified as follows and are maintained by the Office of Technical Support & Asset Management, and the Office of Contracting in accordance with the EMCBC organizational file plan. Small sites shall maintain records under the same Records Category Code which is the equivalent to the DOE records disposition authority and are managed in accordance with their site file plan.

RECORDS TABLE

<b>Records Category Code</b>	<b>Records Title</b>	<b>Responsible Organization</b>	<b>QA Classification (Lifetime or Non-Permanent)</b>
ENV 01-E-06	Assessment/Management Assessment and Oversight Report Form:	Office of Technical Support and Asset Management or applicable Field Office	N/A
ENV 01-B-04-B	Issue Transmittal Form	Office of Technical Support and Asset Management or applicable Field Office	Non-Permanent – maintained as QA record for one year after fiscal year the Corrective Actions are closed.
ENV 01-B-04-B	Assessment/Management Assessment and Oversight Report Form:	Office of Technical Support and Asset Management or applicable Field Office	Non-Permanent – maintained as QA record for one year after fiscal year the Assessment/Management Assessment is closed.

## EMCBC RECORD OF REVISION

**DOCUMENT TITLE: Assessment/Management Assessment and Facility Representative Oversight**

If there are changes to the controlled document, the revision number increases by one. Indicate changes by one of the following:

- I Placing a vertical black line in the margin adjacent to sentence or paragraph that was revised.
- I Placing the words GENERAL REVISION at the beginning of the text.

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<b>Rev. No.</b>	<b>Description of Changes</b>	<b>Revision on Pages</b>	<b>Date</b>
0	Initial Document		8-9-12
1	Update to include changes in title, correct raining requirements, remove the term SME, and other Administrative changes.	All	10-24-13