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DOE HANDBOOK

TEAM LEADER'S PREPARATION GUIDE FOR OPERATIONAL READINESS REVIEWS (ORR)

MASTER

U.S. Department of Energy
Washington, D.C. 20585

AREA MISC

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DISCLAIMER

FOREWORD

This Department of Energy handbook, *Team Leader's Preparation Guide for Operational Readiness Reviews (ORR)*, is approved for use by all DOE Components and their contractors.

Beneficial comments (recommendations, additions, deletions) and any pertinent data that may improve this document should be sent to: Defense Programs, Office of Engineering, Operations, Security and Transition Support by letter or by using the self-addressed Document Improvement Proposal (DOE F 1300.3) appearing at the end of this document.

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TEAM LEADER, TEAM MEMBER, & REVIEW COORDINATOR ORR DUTIES AND RESPONSIBILITIES

PURPOSE: This guidance section provides instructions, explanations and examples for the performance of all phases of an Operational Readiness Review (ORR). Details pertinent to the Team Leader (TL), Team Members (TM) and Review Coordinator (RC) are outlined. An appendix contains sample forms and correspondence which are typically used to initiate and perform the ORR. Although this document was written specifically for use by DOE ORR Team Leaders, its use may also be beneficial to contractor ORR Team Leaders.

PRIOR TO PREVISIT ORR DUTIES

TL <u>Initial Duties</u>: After the projected start date is established, the TL should perform the following:

1. Comply with commitments made in the approved Plan-of-Action.
2. Contact the identified points of contact to discuss details about the upcoming ORR and negotiate prospective dates for the previsit and ORR.
3. Send a letter, as soon as possible after the above negotiations, formalizing the notification of the ORR to site points of contact (see Appendices 2, 3, 4, and 5).
4. Advise the Review Coordinator of dates and agenda for the previsit.
5. Initiate the process of selecting team members to support the ORR as soon as possible.

TL <u>Team Selection Duties</u>: The importance of this task cannot be overemphasized. No other task has such a direct impact on the overall quality of the ORR. The TL selects and organizes the previsit and ORR teams. Additional guidance on team selection can be found in sections 5.4.2 and 5.4.3 of the ORR Standard, DOE-STD-3006-93. Guidelines for completing the process follow:

1. Candidates may be obtained from any independent sources within DOE or from contractors not directly responsible for the oversight or operation of the facility under review. Previous TLs are valuable resources in reviewing the past performance of contractor personnel.

2. Remember that team members must not only have technical experience relevant to their assignment, but also must have assessment experience and be familiar with the facility/process in question. Typically, familiarization with the facility/process is gained during the previsit. In determining the number of team members, experience indicates more members for less time is the best option.

3. Determine whether any conflict of interest, actual or perceived, exists for any candidate or source of candidates. If so, those candidates must be rejected from further consideration. A real conflict of interest (COI) would exist for a contractor who has, previous to the ORR, provided direct support to a facility in an area which will be reviewed during the ORR. For example, DOE has used mentors at some facilities to assist in improving the conduct

PRIOR TO PREVISIT ORR DUTIES (continued)

TL

of operations at the facility. It would be inappropriate for this contractor to be a part of the ORR team.

A perceived COI could exist when a contractor has provided indirect support to the facility or was an employee of the facility at some other point in their career. An example of indirect support could be participation on review team evaluating facility safety basis documentation. The second case is self explanatory. These cases are more subjective, but the TL should be sensitive to them and avoid them if possible.

4. No individuals directly involved in the management or operation of a facility can participate as team members in their area of responsibility at the facility.

5. With regard to selecting administrative staff for the ORR, it must be noted that the administration of the forms and summaries is a prodigious task. It has been found that one person (the ORR Review Coordinator) should be dedicated to administering the forms, e.g., logging in and tracking. This task is very time consuming once forms begin being turned in and increases as the ORR progresses. In addition, at least one other person, with a word processor, should be dedicated to editing the forms. Consideration should be given to bringing in supplemental editing staff toward the close of the ORR. It should also be recognized that a significant amount of copying will need to be accomplished at the close of the ORR.

6. Concurrent with the above tasks, work with the site point of contact to obtain counterparts. A counterpart is an individual designated by the site to assist in coordinating the ORR team's inspection activities. Each ORR team member should have a counterpart for each area under evaluation.

7. As soon as team members and counterparts have been selected, disseminate a list showing counterpart's telephone, and facsimile numbers to team members. The list is important for informing team members of their selection and their counterpart, which allows for early contact and preparation.

RC

o After team selection is made, obtain social security number, date of birth, address, phone number, fax number, type of clearance, and funding information for all team members.

o Assist the TL with developing team member/counterpart chart.

Scheduling/Coordination Responsibilities

RC

o Prepare ORR notification letter and enclosures for the TL (Appendix 2).

PRIOR TO PREVISIT ORR DUTIES (continued)

RC o Make a contact list for the previsit ORR team. The list should include site contact names, phone numbers, fax numbers, hotel information, site security office number, per diem rates. (Some of this information will be provided to the Review Coordinator by the TL).

o Send ORR Implementation Plan and CRADs to ORR previsit team members for their review.

o Reserve a block of rooms for ORR previsit team members. Send the hotel a team list, if required.

ADDITIONAL GUIDANCE FOR PREPARING FOR BOTH PREVISIT AND ORR

These duties involve the preparation of the data packets, travel, and other logistics. The TL should manage the performance of the following items.

TL o Data Packets: Data packets are used to provide team members with information and documents that enable them to better prepare for the previsit and ORR.

o Working with the RC, assemble and distribute data packets to team members. The normal makeup of the data packet is provided in Appendix 6. Mail data packets early to ensure that team members have their packets at least two weeks prior to the previsit.

o Other Logistics: Verify compliance with the request for logistic support that was sent (Appendix 3) with the letter of confirmation.

RC o Inform team members, usually these instructions are included in the data packet, to call the hotel and confirm their reservation and to guarantee it with a credit card.

o Make security clearance arrangements for the ORR previsit. Complete DOE F 5631.20 (277's), Request for Visit or Access Approval forms for previsit team. Discuss access requirements with the site point of contact before the previsit to determine which Sigmas are needed. Discuss security procedures for any uncleared team members.

o Make sure the team has maps of the site and how to get to the site and hotel from the airport. Maps can be found in the ORR files or they should be requested from the site.

o Make contact with site coordinator to introduce and discuss logistical questions. Discuss sigma/security requirements for cleared and uncleared team members and if there are any special procedures to bring in equipment, such as laptop computers, or supplies such as computer disks.

ADDITIONAL PREPARATION FOR BOTH PREVISIT AND ORR (continued)

RC
- o Verify that all team members' clearance information and all necessary forms for access to the site have been forwarded to the site. Verify that this has occurred at least one week prior to the previsit.
- o Complete the necessary forms for access to the site for all team members and forward the data to the site.
- o Verify that all reference material needed by the team from HQ has been provided to team members four to five days before the team's arrival for the previsit and ORR.

Team Member Preparation for both Previsit and ORR

TM
- o Each team member should receive and review their data packet. The data packet provides team members with information on the site, their assignments, including deliverables, and responsibilities of the team member.
- o Each team member is to contact the Hotel to confirm their reservation and guarantee it with a credit card.
- o Each contractor is responsible for providing clearance information to the RC. Provide the following clearance information:
  1. team members' name
  2. social security number
  3. date of birth
  4. organization/company name
  5. the type of clearance held.
- o If special training or fittings are required, such as respirator fitting, for access to certain facilities, arrange to have any pre-conditions completed before arrival for the previsit. For example, respirator fitting requires a medical exam before the fit test can be administered[1]. Other special training could include Radworker II and Hazardous Waste Operations Training. The TL will inform all team members of any special requirements.
- o Team members are to contact their counterpart during the preparation phase to obtain information they feel is necessary or to arrange for additional documentation to be readily available onsite. However, keep these requests to a minimum.

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[1] The Health unit in the A-wing basement in GTN can provide respirator fit exams to federal employees only. Contractors will need to arrange for this on their own.

ADDITIONAL PREPARATION FOR BOTH PREVISIT AND ORR (continued)

TM o The site appointed counterpart is a crucial element to the ORR inspection. They should be in constant communication with the team member during the inspection and will provide the best source of site specific information and access available to the subteams.

PREVISIT: The previsit is a fact finding and familiarization visit conducted by as many team members as possible. A comprehensive previsit lays the foundation for a thorough and efficient ORR and normally satisfies the requirement for team members to be familiar with the facility/process. The following are items to consider for completion during the previsit.

TL o Brief site management on the mission, the methodology, and the scope of the ORR process, as well as the logistical support required from the site.

o Arrange for the Operations Office/Area Office and/or contractor management to brief the team on safety, security, the organization, processes and operations of the facility. Specifics of the startup (e.g., initial shut-down, restart following upgrade, restart following a safety shut-down) should be included in the briefing.

o Complete final review and editing of the CRADs. Have TMs provide their proposed CRAD changes prior to the end of the previsit.

o Attend a tour and observe any current operations to acquaint team members with the facility and processes in question.

o Attend any special training or fitting, such as respirator training and fitting, which might be necessary to allow for access to the facility during the ORR. Verify that all team members have met any pre-conditions prior to their arrival at the site[2].

o Develop a Shift Evolution and Interview List(s) and provide it to the site so they can plan and schedule events and personnel availability. Each team member should provide input prior to completion of the previsit. Efforts should be made to coordinate the interviews among team members to minimize the impact on site personnel.

o Schedule a counterpart meeting. Each team member should have acquainted themselves with their counterpart and developed their inspection requirements during the preparation phase.

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[2] For example, respirator fitting requires a medical exam before the fit test can be administered. The Health Unit, in the A-wing basement of Germantown, provides fit exams to federal employees only.

PREVISIT (continued)

TL o Arrange for any documents designated as required reading for team members to be available to team members. Scheduling periods of free time during the previsit to allow this to be accomplished is valuable, particularly if any of the required reading is classified.

o Investigate other or additional hotel accommodations for the ORR if necessary.

TM o Review the ORR Implementation Plan including the Criteria and Review Approach Documents (CRADs). Ideally, each team member should have received an advance copy of the plan to enable a thorough preview of their assigned objectives and criteria.

o Team members should arrive at the site as scheduled, having met any prerequisites for site access which were provided by the TL.

o During the previsit, Team Members will:

a. Receive briefings by the Operations Office/Area Office and/or contractor management on safety, security, the organization, processes, and operations of the facility as well as, specific information concerning the nature of the restart or startup.
b. Tour the site and/or facility to observe any current operations to acquaint team members with the facility and processes in question.
c. Complete any special training or fitting, such as respirator training and fitting, which might be necessary to allow for access to the facility during the ORR.
d. Develop their Evolution and Interview List(s) to be provided to the site so they can plan and schedule events and personnel availability.
e. Meet with their counterpart and develop a methodology for completing their assigned criteria.
f. Expect and plan to be in regular communication with the site-appointed counterparts as they will provide the best source of site specific information and access available to the team member.
g. Complete any required reading of documents that is impractical to be accomplished elsewhere, e.g. classified documents.
h. Provide proposed CRAD changes to the TL before the end of the previsit for inclusion in the Implementation Plan.

Initial Team Meeting: The following specific items are suggested for discussion.

TL o Define the ORR team's relationship with the site. The ORR is conducted to verify the site's readiness to safely conduct operations.

PREVISIT (continued)

TL
- o Emphasize that the ORR inspection is an arduous and time consuming process for which team members are expected to provide their complete and undivided attention.

- o Establish that the TL is responsible for all aspects of the inspection.

- o Define the expected schedule for the ORR, including the time frame for submission of all deliverables (see Appendix 9).

- o Explain the need for and use of the various forms, e.g., Form 1s, and 2s.
  - Assessment Forms (Form 1s) are used to document the methods and actions taken in the criteria evaluation process. Additional guidance is provided in Appendix 4 of the ORR Standard and Appendix 10 of this document.

  - Deficiency Forms (Form 2s) are used to document the findings uncovered during the criteria evaluation process. Findings are to be documented (i.e., a Form 2 drafted) as soon as there is reasonable evidence to substantiate a finding. This allows the TL to present site management a daily briefing of emerging issues and allows the site to better facilitate the finding validation process. Additional guidance is provided in Appendix 4 of the ORR Standard and Appendix 10 of this document.

- ☐ Provide administrative information such as area phone numbers, dining locations, etc., at this meeting.

- o Advise team members to keep the TL abreast of all concerns and new developments as they arise to minimize confusion and miscommunication as information is collected.

- o Advise team members that participation in any site activity by the team members (e.g., special tours) not directly related to the review must be cleared by the TL. All discussions with site management outside the assigned CRADs should also be cleared through the TL.

- o Insist that all complaints, concerns, suggestions, and information be passed through the TL as soon as possible. Identify problems with counterparts to the TL.

- o Advise team members not to meet with external regulatory or oversight agencies, such as state environmental protection agencies, without the permission of the TL. Exceptions must be approved in advance with the TL who must notify the Area and/or the Site Office Manager.

PREVISIT (continued)

TL o Advise team members to strictly adhere to the need-to-know criteria in dealing with classified shapes, components, data or processes. Team members should immediately identify any difference of opinion which arises with the site on access to information.

o Explain that no contractor business development will take place onsite. Any such activity will result in removal from the ORR. This does not mean that a contractor must refrain from giving out a business card, if asked. It does mean they are not permitted to solicit business from site personnel.

o Explain the format to be used for completing the final report and how the team members' input will be integrated into the report.

PREPARING FOR THE ORR

Team Leader Responsibilites

TL o Finalize the ORR Implementation Plan: The Implementation Plan should be finalized immediately following or even during the previsit, if possible. Further information concerning development of the Implementation Plan is contained in section 5.9.2 and Appendices 1 through 4 of the ORR Standard. Prior to release by the TL, the plan should be forwarded to the Office of Environment, Safety and Health (EH) for review and comment as discussed in section 5.3.2 of the ORR Standard. The Implementation Plan should be provided as early as possible to EH and the Defense Nuclear Facility Safety Board (DNFSB), if applicable, for review and comment.

o Establish ORR Length: In developing the ORR schedule, several factors need to be considered, among them the complexity of the facility/process being reviewed, the number of team members available, and the number of interviews and evolutions to be conducted. Experience has shown that even limited scope ORRs need a minimum of a week for field work. Several days are then needed to analyze the data, conduct follow up, and develop coherent and informative conclusions, as well as to complete the extensive administrative requirements prior to leaving the site.

Review Coordinator Responsibilities

RC o After ORR dates are confirmed, reserve a block of rooms and send rooming list to the hotel with names and check-in/check-out dates, if required. Make the reservation under the DOE ORR team. Make arrangements for a meeting room at the hotel for the initial team meeting, if necessary.

RC o Prepare security clearance forms for all team members. Complete form DOE F 5631.20 (formerly 277) Request for Visit or Access Approval for team. 277's are not completed for uncleared team members.

PREPARING FOR THE ORR (continued)

RC o Provide the site point of contact with a list of names and social security numbers in order for them to track clearance status. Ensure the site security office has received a copy of this list either from site point of contact or by directly faxing them a copy.

o Assist in preparing data packets for team members (see Appendix 6). The following information is provided by the RC:

a. the hotel meeting room number, if applicable;
b. where and when to get badges;
c. badge office hours;
d. special arrangements for any uncleared team members or personal computers;
e. what to do in case a team member gets delayed and can't be at the right place at the right time;
f. if any special training is required;
g. where the onsite team room is located;

o Provide the following:

- blank forms with the inspector's objectives and criteria filled in, on a diskette;
- Maps;
- Detailed schedule, (Appendix 7);
- Team member assignment and counterpart matrix;
- Team member deliverables, (Appendix 9);
- DOE 5480.31 and Standard DOE-STD-3006-93; and
- Sample format for Forms (Appendix 10), if the TL chooses to use this format.

o Make arrangements to mail data packets to team members. Packages should be delivered to team members at least two weeks before the beginning of the ORR.

o Keep the site point of contact informed of any team member/schedule changes by updating and faxing the team member assignment chart. Make sure latest date is on the chart.

o Prepare package to mail to hotel. The package should include any information/documents the TL and DOE-HQ team members need for the ORR and the standard formats/examples such as latest team member assignments, latest agendas and schedules; computer disk with all ORR information; blank Form 1s and Form 2s; previous ORR closeout summary examples; and the template for the word processing software to be used. Mail the package to the hotel. The package should arrive at the hotel before the team arrives.

ORR DUTIES

RC o Prepare a macro for all Forms to be loaded on all computers provided by the site and any other computer that a team member desires.

The ORR begins with the arrival of the team at the hotel or site.

TL o Ensure all team members have completed all access requirements of the site.

o The TL normally meets every morning with site managers to brief them on the issues raised by the previous day's review activities. The TL presents the site with draft Form 2s detailing the findings uncovered during the previous day's inspections. This greatly enhances site/team communication and allows the site to better facilitate the validation process.

o Hold daily team meetings, usually held in the afternoon, to discuss emerging issues.

- Functional Area Leaders, if assigned, or team members brief the TL on the issues uncovered during the day (this is not intended to be a travelogue of the day's events). Issues deemed sufficiently substantive by the TL will be drafted onto Form 2s.

- Some duplication of effort is to be expected and it can often lead to beneficial cross-talk and fuller understanding of the issues.

- Issues raised may be assigned to a different subteam if it is felt that better coverage will result.

- Any disputes between subteams that occur are resolved by the TL.

o Additional guidance for the conduct of the ORR can be found in section 5.4.6 of the ORR Standard.

Opening Meeting at Site: This meeting is the "kickoff" meeting for the commencement of the ORR. Items to consider for completion during this meeting include:

TL o Make introductions.

o Allow for a series of briefs by the site explaining the site's management and organization, its functions, operations and interfaces.

o Brief the audience on the ORR process and the ORR schedule.

Team Meetings: Items Which Should be Reiterated Throughout the Inspection:

TL
- o Encourage the identification of any unclear issues. They still need to be identified so that others may consider them at a later date.
- o Re-emphasize that team members should focus on that portion of the organization directly responsible for their area. Contact outside their area, specifically including interviews with senior site management, must be discussed in advance with the TL.
- o Insist on validation of facts. ORR teams validate facts they collect on a continuous basis. The Area or Site Office and the counterparts are the primary points of contact for validating facts.
- o It is also important to try and gauge the response of site management to the conclusions that are drawn from the validated facts.
- o Maintain a running record of the important issues brought out at each nightly meeting.
- o The technical editor will review all Forms and summaries. Team members are encouraged to use the technical editor's assistance.

TM
- o Team members are responsible for providing the TL a draft Form 2 for each finding by 0800 the next morning. This allows the TL time to review all Form 2s prior to the daily site briefing.
- o Validation of facts is a must. The Area or Site Office and the counterparts are the primary points of contact for validating facts. If facts have not been validated, don't use them. If you have validated facts, know with whom or by what reference, you validated and be sure that they know and that they have the authority to validate.
- o Assessment Forms (Form 1s) are used to document the methods and actions taken in the criteria evaluation process. Team members are encouraged to update their Form 1s daily to ensure complete record keeping of all inspection activities. Additional guidance is provided in Appendix 4 of the ORR Standard, and Appendix 10 of this document.
- o Deficiency Forms (Form 2s) are used to document the findings uncovered during the criteria evaluation process. When issues are unclear, they still need to be identified so that others may consider them at a later date. If you begin to have suspicions about something, report the concern and let the site follow it up. Avoid delaying the drafting of a Form 2 until there is overwhelming evidence as this may excessively delay the validation and correction processes. Additional guidance is provided in Appendix 4 of the ORR Standard and Appendix 10 of this document.

During the ORR, the RC works closely with the TL providing administrative and logistical support.

RC

- o Hand out latest team member assignments and agendas/schedules and any guidance on writing Forms and summaries (see Appendix 10).
- o Provide administrative and logistical support to team members.
- o Get to know the site, i.e., locations of library, copy center, fax machine, supplies, etc.
- o Find out about site-specific security procedures, i.e., do team member notes need to be reviewed for classification? If so, where?
- o Check all computers and printers to make sure they are working properly. Arrange for repairs or replacement if necessary.
- o Load Form 1 and 2 files onto all computers.
- o Attend team meetings and manage the Form 1 and Form 2 tracking system(s). A suggested procedure to manage the forms is as follows: (1) get a hard copy with diskette from each inspector or subgroup team leader; (2) the form(s) are logged in; (3) a copy should go to the TL as soon as possible and a copy is placed in the logbook; (4) after the TL reviews and comments on the form and it has been edited by the technical editor, the form is returned to the inspector for revision or signature; and (5) revisions and editing are then accomplished between the inspector and the technical editor with the TL reviewing only the final edited and signed version submitted by the inspector.

Final Team Meeting: This is the last opportunity to work directly with team members and clarify any questions that have persisted throughout the ORR. Final Form 1s and Form 2s are due prior to this meeting as is a draft summary evaluation of the assigned objectives for inclusion in the final report. This is the last opportunity to discover and address dissenting opinions and conflicts prior to presenting the ORR results to the site. Any such issues must be addressed at this time to avoid any confusion at the Close-out meeting.

TL

- o In preparation for the Close-out Meeting announce and discuss the following items:
  - a. The closeout meeting will be kept short.
  - b. Attendance will not be limited. Anyone interested may attend.
  - c. All findings are subject to the approval of the TL and the Senior Advisers, if applicable.
  - d. Discuss the final report schedule and deliverables.

ORR DUTIES (continued)

TL o All findings should be discussed at this meeting. A consensus must be reached by the team on each findings' categorization as prestart, poststart, observation, or, if appropriate, deleted. Discussing all findings at this meeting will help bring the team to a unified position on the general status of the facility or process being reviewed.

TM o All Form 1s and Form 2s should have been submitted to the TL. They must be signed-off by the TL.

o Summary evaluations should also have been completed and submitted to and signed-off by TL prior to this meeting.

o Be prepared to justify all findings.

<u>Close-out Meeting</u>: The close-out meeting is the forum by which the TL informs the site management of the major issues uncovered during the ORR. There should be absolutely no surprises at this meeting as counterparts and site staff should have been kept well apprised of all issues during the conduct of the ORR.

TL o Prepare a discussion based on the Form 1s, Form 2s, and conclusions drawn by the ORR team.

RC o Assist the TL in preparing the close-out briefing.

o Make arrangements for the site to mail information that was brought with the ORR team or collected during the review to the team members. This package should be sent on the day of the close-out meeting.

☐ Make copies of Form 1s and 2s for dissemination to site management.

TM o All team members will remain near the close-out meeting and be prepared to answer questions regarding their findings should the TL need their support.

POST ORR: <u>Final Report</u>

TL o The Senior Advisers, if applicable, must review and concur with the final report before it is issued.

o Consistent with the number of findings, the final report should be issued within two weeks of the end of the inspection. The TL is the issuer of the ORR report.

o The Final Report should be sent to the restart authority with copies to the applicable program office, operations and/or area office, EH, and the DNFSB if applicable.

POST ORR: Final Report (continued)

TL o If a TM has a dissenting opinion, refer to DOE-STD-3006-92, Planning and Conduct of Operational Readiness Reviews, for guidance.

o Detailed guidance for the preparation of the final report is contained in sections 5.5 and 5.9.3 of the ORR Standard.

o Ensure that all ORR files that may be needed in the future are maintained in one location as determined by the DOE line management for the site.

o The completion of the ORR, and the finalizing of the report do not signify the end of the ORR process. Several actions may require the participation of the TL including briefings, interpretations and possible defense of findings, review of action plans, and review of finding closure plans. Additional guidance can be found in section 5.7 of the ORR Standard.

Finding Closure and Team Follow-up:

TM o Team members may be called upon to assist the TL in several ways including briefings, finding interpretation, review of action plans, or review of finding closure. The TL will notify team members when such assistance will be needed. Section 5.7 of the ORR Standard provides additional discussion concerning post-ORR activities.

RC o Draft thank-you letters to site for TLs signature.

o Collect, condense, index, and file pertinent ORR information to include:
a. all correspondence related to the ORR;
b. all final Form 1s and Form 2s signed by the inspector and TL;
c. the Evolution and Interview List and schedule;
d. the approved Plan-of-Action;
e. the approved Implementation Plan; and
f. the approved Final Report with all signatures from the team members and TL.

LESSONS LEARNED FROM PREVIOUS ORRs

The following items were learned from conducting previous ORRs and Readiness Assessments from which participants could benefit.

BEFORE PROCEEDING WITH A DOE ORR:

- Have an approved Plan-of-Action as early as possible in the ORR process.

- Verify an approved safety basis, the foundation of the readiness process, is complete and encompasses the entire process before the start of the DOE ORR. Starting the DOE ORR prior to site readiness can severely compromise the effectiveness of the ORR.

- It is imperative that the facility has achieved readiness status before starting the ORR. Reviewing the management self-assessment, if conducted, provides practical information from which to determine readiness status and demonstrate readiness for the ORR team.

- DOE line management must achieve and verify readiness before starting the DOE ORR.

- Well documented results of the contractor ORR, including corrective action plans or documentation of corrective actions taken is important. Copies of corrective action documentation need to be readily available to the ORR team. Corrective action closure packages should be prepared in accordance with DOE-STD-3006-93, Section 5.7.3. The level of detail of the assessments of corrective actions needs to be equal to the initial assessment.

- Determine line management's commitment and support of Conduct of Operations as evidenced by, or lack of, a walkthrough program, documented root cause analyses and lessons learned, degree of formality in managing procedures changes, and indication of operational casualty procedures.

USING FORMS

- Provide a training class at one of the first team meetings on format, content, and style (how to use and fill out) Form 1s (Assessment Forms), Form 2s (Deficiency Forms). For Functional Area leaders provide the information on format, style and content on what is expected in the Functional Area Summary. Although samples are included in each team members' data packet, it is sometimes overlooked as there is a mass of information for team members to review before they begin their inspection. This has resulted in considerable frustration at the conclusion of the review while Forms and Summaries are reworked for the final report. The Team Leader's Guide provides explicit instructions and whoever provides the training can use the information to train the review team members. The Technical Editor or the Administrative Coordinator are equally aware of the requirements and could conduct the training.

- Provide draft Form 2s to site personnel as soon as an issue starts to be identified. Make sure it is understood that these are draft documents (and marked as such) to avoid legal or public record exposure issues. Having these draft Form 2s allows the site an opportunity to produce further information that may clarify the issue.

CONDUCT OF DRILLS

- o Specify, in pre-ORR correspondence to the site, whether formal drills will be expected. Provide detailed guidance on drill expectations, e.g., type of drill, desired precondition, scenario outlines.

- o Define, during the preparation phase, the roles, authority and responsibilities of the ORR Team when it is monitoring the conduct of an emergency exercise or drill. The ORR Team must not disrupt the flow of the exercise, but since it is evaluating both the facility and the emergency preparedness training organization, these roles, authority and responsibilities require definition and understanding.

LOGISTICS AND SUPPORT

- o Communicate logistical needs and requirements to the site well in advance of the review. For example,

  a. Specify what documents need to be available to the team and that those documents need to be in a central location for easy access by the team during the review.

  b. Specify that computers need to be up-to-date models. Printers and copying machines, with adequate supplies of paper, toner, etc. need to be dedicated to the team for the duration of the review.

  c. Request administrative support personnel (typists with WordPerfect experience) if at all possible as they are especially helpful when preparing the last pieces of documentation for the final report.

  d. Schedule UCNI reviewers to come to the team work area at the end of the day during at least the last week of the review.

  e. Request sufficient office space and computers to support, at a minimum, each functional area sub-group. Working in one large room is difficult since much discussion takes place among site, review team, and field office groups. This can be distracting.

  f. Request the site make available laptop computers if at all possible. This has facilitated off-hour and off-site work.

- o Establish communication between the facility being evaluated and the evaluation team early. Define the "rules of the road." This can improve the effectiveness and efficiency of the review. Explain the daily briefings, what will be shared, where, when. Identify what, if anything, will be expected at these meetings from the site.

TEAM ISSUES

- o Emphasize team members are dedicated for the duration of the review. If a team member completes his/her review before the end of the review, and is authorized to leave, their Form 1s and Form 2s must be signed-off by the Team Leader before they leave the site. If a Summary is due from the team member, the Summary must be signed off by the Team Leader prior to the team member's leaving the site.

- o Emphasize team members need to familiarize themselves with the Implementation Plan and the facility/process under review before the ORR.

- o Ensure counterparts have been assigned to each team member or functional area group. Early identification of documents needed, interviews expected, areas and materials to be evaluated etc., is helpful to both the team member and the counterpart. Counterparts need to understand they should be prepared to present the information required. Team members need to be respectful of their counterpart's time constraints and schedule as few after hours meetings or interviews as possible.

- o Team members must have the technical knowledgeable to assess the areas to which they are assigned.

DEVELOPING THE IMPLEMENTATION PLAN

- o The objectives and criteria must clearly encompass all aspects of the required Core Objectives, as well as the physical boundaries of the ORR.

- o Review criteria must incorporate all aspects of the referenced objectives.

- o Review criteria must be written with an understanding of the facility programs.

- o Review criteria should be written with an understanding of how the criteria will be described on the Form 1 appraisal forms.

- o The facility must be visited and the basic documentation controlling the facility must be reviewed prior to development of the Implementation Plan.

- o Fully involve the team early in the process for training and Implementation Plan development. In addition, early dialogue with the site to gain understanding of the activity in progress and the contractor activity is particularly useful.

- o Give the Plan-of-Action and the Implementation Plan to oversight groups, i.e., the DNFSB and EH, as soon as possible. Early review and input from all stakeholders will reduce last minute perturbations.

DEFINING THE SCOPE AND GRADED APPROACH

- o The scope of the DOE ORR needs to consistent with that of the contractor ORR. Differences between the two result in difficulties in performing the DOE ORR. DOE 5840.31 provides a structure for such consistency.

- o It is appropriate to go beyond the defined scope in a case where an ongoing program that supports the process or facility under review but which is "outside" the scope of

APPENDICES
STANDARD FORMS AND LETTERS

KEY POINTS TO DISCUSS DURING INITIAL CONTACT WITH SITE

Refer to the Plan-of-Action, and:

1. Contact DOE Headquarter Director of Facility.

   Facility________________________
   Director's Name____________________
   Telephone Number__________________

2. Identify yourself as the Team Leader for the ORR.

3. Discuss the review schedule.

   Previsit dates: ____ to ____
   ORR dates: ____ to____

4. Explain overview of review process (if requested).

<u>Previsit and Preparation</u>

- Site Visit: 2-3 day for site and facility familiarization, tour, and presentation to site of inspection process.
- Information needed from site: (list to be provided)
- Counterparts: Site expected to provide list of counterpart(s) for each area.

<u>Onsite Review Period</u>

- Purpose: Identify findings and observations for the safe startup of facility process(es).
- General: Up to 30 team members, approximately a two week period, though with a graded approach, as few as 10-15 team members may be needed for one week.
- Logistic Support: Conference room, work space, computers, phones, fax, etc. (list to be provided).

5. Request point of contact at site to support review and to receive formal correspondence.

   Name: ____________________________________
   Telephone number:______________________________

6. Leave your telephone number and advise site contact that written confirmation will follow.

SITE CONTACT MEMORANDUM

Refer to the Plan-of-Action.

Operations Office or Area Office Manager

Operational Readiness Review of Facility________________.

An Operational Readiness Review (ORR) of Facility___ will be performed. Site point of contact______ has been identified as the lead Department of Energy contact at the site. _ Team Leader_ will lead the review team.

Enclosed are a preliminary schedule for the overall review and a detailed schedule for the onsite portion, an agenda for the pre-review visit, a list of support required for the onsite portion of the review, a list of site documents required to prepare the team for the review, and an ORR summary document. Please forward one copy of each requested document to _ Team Leader_ by __Date___.

Please contact Team Leader_ (301-903-_____or 301-903-_____) if you wish to discuss these items or any other aspect of the review.

Your assistance is greatly appreciated.

Team Leader

Attachments
cc w/Attachments:
Manager, Area Office
Program Office Director

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*Attachments
ORR Logistics (Appendix 3)
ORR Review Schedule (Appendix 4)
ORR Previsit Schedule (Appendix 5)

OPERATIONAL READINESS REVIEW
LOGISTICS

The following list suggests items the TL should consider. It should be personalized by the TL for each ORR.

- o The team will require work space for approximately ____ people to review documents, conduct interviews, prepare reports, and conduct meetings.
- o Work spaces should be equipped with several IBM compatible PCs and laser printers. A current version of Wordperfect should be installed on each system. One copy of a familiar graphics program should be available on one of the team support staff's computers.
- o Work spaces should have phones with contractor and DOE phone books.
- o The team will require ready access to photocopy machines.
- o The team will require ready access to a facsimile machine.
- o A list of support personnel or a single contact to repair equipment, receive phone messages, and aid in logistical problems should be available at the start of the review.
- o Adequate visitor parking should be available for team members.
- o The team may require ready access to a classifier and a classified document repository.
- o The team will require ready access to the following documents in a convenient, centralized location at the site: (Note: the following are examples of documents that the Team Leader can request to have available during the ORR)
  - DOE Orders and mandatory standards (DOE 5480.4).
  - General facility schematics.
  - List of Facility Representatives and Facility Managers (per DOE 5000.3).
  - Hierarchy of documents: Top-level policy and site wide procedures down to operating instructions.
  - Current listing of titles, numbers, and revisions of manuals/procedures.
  - Implementation plans submitted to Headquarters for DOE Orders. These would include all of the Orders specified in DOE 5480, DOE 5500-series Orders, DOE 4330.4, and 5700.6.
  - Any exemption, exception, deviations, variances, or waivers requested for ES&H Orders.
  - DOE and Contractor ES&H oversight plans/programs, and self-assessment program manuals.
  - All DOE Field/Area Office and Contractor self-assessment reports for the past 12 months.
  - Contractor and DOE organization charts with management/supervisor names.
  - Functional description for environmental, safety, and health (ES&H) organizations (NQA-1).
  - General site map.
  - The Tiger Team/TSA Action Plan(s) and the most recent Status Report for the Tiger Team Assessment.

- A list of functional review reports issued within the last 12 months by DOE-__FIELD__ __OFFICE__ regarding __SITE__ (DOE 5482.1).
- All DNFSB, EH, NS, IG, EPA, OSHA reports issued within the last 12 months.
- The most recent contractor triennial management review (required per DOE 5480.5) of the internal safety review system.
- Site Development Plan (ref. 4300.1).
- Annual Site Environmental Reports; the most recent, even if in draft form, and the preceding year (ref. 5400.1 Ch. II).
- Environmental Monitoring Plan and it's associated Meteorological Information/Monitoring Program (ref. 5400.1 Ch. IV).
- Spill Prevention, Control and Countermeasures Contingency Plans (if applicable).
- Inventory of hazardous chemicals (those above Threshold Planning Quantities per SARA Title III) by room, area, or building, as appropriate to planning walkthroughs. (Remove portions that are classified).
- SARA Title III Tier One and Two reports.
- Most recent site-wide EIS and/or EA.
- National Emission Standards for Hazardous Air Pollutants (NESHAP) report (if applicable).
- All Type A accident investigations reports for the last two years.
- OSHA 200 log from past two years.
- Site Radiation Control Manual and associated implementation plan.
- DOE and Contractor Quality Assurance Program Manual.
- List of Quality Assurance plans and implementation procedures.
- DOE and Contractor Conduct of Operations Manual.
- List of Conduct of Operations plans and implementation procedures.
- Operator training program documentation.
- List of ES&H policies and procedures of the Field Office and Contractor.
- Contractor's ES&H Manual.
- List of applicable Technical Safety Requirements.
- Applicable Safety Analysis Report(s).
- Site-specific Explosives Safety Manual (if applicable).
- Explosives Safety Policy Statements (if applicable).
- Explosives Handling, Storage, and Disposal facility Design Bases/SARs (if applicable).
- Site Fire Protection Manual.
- Site Pre-fire Plans.
- All Fire Department Procedures.
- Fire Protection staff organization charts and job descriptions.
- Staffing plans and any analyses relating to staffing for the past 12 months.
- Applicable DOE Order Compliance Documents and Compliance Schedule Agreements.
- Site Emergency Plans

OPERATIONAL READINESS REVIEW PRELIMINARY SCHEDULE

Activity	Date(s)
Previsit	
Onsite Review	
Close-out Meeting	
Report Preparation	
Issue Report	
HQ Briefing	

Note: The above dates are tentative. The team intends to conclude identified activities within the allotted windows on the schedule, but adjustments may be made to accommodate particular issues that may require more or less attention.

PREVISIT SCHEDULE

NAME OF FACILITY

Activity	Date	Participants
Site Access	Month, Day, Year	Full ORR Team
Previsit Start	Month, Day, Year	Full ORR Team
Orientation Meeting[1]	Month, Day, Year* (a.m.)	Site Management Full ORR Team
ORR TL Presentation[2]	Month, Day, Year* (a.m.)	Site Management Full ORR Team
Counterpart Meeting[3]	Month, Day, Year* (p.m.)	Site Counterparts Full ORR Team
Site/Facility Training and Processing[4]	Month, Day, Year* (p.m.)	Full ORR Team
Tour	Month, Day, Year*	Full ORR Team
Previsit End	Month, Day, Year	Full ORR Team

*Site to specify times and locations.

[1]Orientation Meeting - The goal is to receive from the site an overview of the site activities in progress and any special operating guidance required for the ORR team members. Include in the presentation, all safety and security briefs to ensure ready access, overviews of the organizational structure, document hierarchy, assessment activities, occurrence reporting and tracking, training organization, lessons learned programs, and any other desired elements (approximate Time: 2 hours)

[2]TL ORR Presentation - The TL will make a short presentation on the ORR scope and process to the site (approximate Time: 30 minutes).

[3]Counterpart Meeting - Each ORR team member or functional area is assigned a site counterpart. This meeting provides an introduction of the site counterparts to the Team (approximate Time: 1-2 hours).

[4]Site/Facility Training and Processing - The goal is to receive from the site the training and processing (e.g., respirator training and fitting) so as to permit all team members ready access to the site/facility during the ORR.

CHECKLIST FOR ORR TEAM INFORMATION PACKAGES

Description	Appendix No.
Transmittal letter.	Appendix 8
Maps from airport to hotel/site.	Provided by site.
Schedules for ORR team.	Appendices 4, 5, and 7
DOE ORR Plan-of-Action.	Provided by TL
DOE ORR Implementation Plan.	Provided by TL
Site organization charts.	Provided by site.
Team member assignment and counterpart matrix.	Provided by Review Coordinator
ORR Order (5480.31) and Standard (DOE-STD-3006-93)	Provided by Review Coordinator
Contractor ORR Report.	Provided by TL
Required Reading Documents	Provided by TL
Team Member Deliverables List	Appendix 9
Blank Form 1s and 2s on diskette (note: the objective and criteria should be filled in on the forms)	Provided by Review Coordinator

DETAILED SCHEDULE FOR ORR TEAM

Month, Day, Year Travel to ______________________.
Optional: You may pick up your badge at ____________.

Month, Day, Year Team meeting at the site (Room ___, ___ a.m./p.m.)

Month, Day, Year Start ORR.

Month, Day, Year Tentative date for Close-out meeting.

Month, Day, Year Travel from __________________.

DATE: ___________

NOTE TO: Name of Site/Facility Operational Readiness Review Team Members

FROM: NAME, DOE ORR Review Coordinator

SUBJECT: Operational Readiness Review at ___________________.

Attached is the detailed schedule for the Operational Readiness Review (ORR) at _______________. Your badge will be ready for pick up at the Badge Office which is located ___________. You will need access authorization for Sigmas _________. The badge office is open from _____ a.m. to _____ p.m.

The site is providing a team room located in ____________ for our use throughout the entire review period.

Attached are the functional area assignments; the review methodology for ORR team members; a Site organization chart; team member duties and responsibilities; required reading assignments, list of deliverables, and the assigned Criteria and Review Approach Documents (CRADs).

If you have any questions or if I can be of further assistance, please call me (301-903-_____).

TEAM MEMBER DELIVERABLES

- Qualification Summary; due before or during the previsit.
- Security clearance data; due as required by the Review Coordinator.
- Comments on Criteria and Review Approach Documents; due before or during the previsit.
- Evolution and Interview list; input due to TL prior to the end of the previsit.
- Form 1 for each CRAD Objective assigned; due before the final team meeting of the ORR.
- Form 2 for each deficiency identified; due in draft form by 0800 the morning after the deficiency is identified and due in final form before the final team meeting of the ORR.
- Final Report Summary; due in draft form before the final team meeting of the ORR and signed-off by the TL before leaving the site.
- Final Report, including Form 1s, 2s, and functional area Summaries, reviewed, signed by the team member and TL by the end of the ORR. Any dissenting opinions must be prepared and submitted by the end of the ORR.
- Lessons Learned for inclusion in the report and in later versions of this handbook.

INSTRUCTIONS FOR COMPLETING ORR FORMS
ORR ASSESSMENT FORM 1

OBJECTIVE:	CRITERIA: DATE: 10/12/94	CRITERION MET	
		YES____	NO____

OBJECTIVE: (2 spaces) Copy the Objective from the Implementation Plan.

Criterion: (2 spaces) Copy the criterion as written in the Implementation Plan.

Records Reviewed:

o(F4) Cite a specific document
o(F4) Cite next document, etc.

Interviews Conducted:

o(F4) Use title, (do not use name)
o(F4) Title

Shift Performance Evolution:

o(F4) Use N/A if not applicable

Discussion of Results:

Record Review: (2 spaces) Discuss the record review.

Interviews: (2 spaces) Discuss the interviews.

Shift Performance: (2 spaces) Discuss the shift performance observed or write None, if not applicable.

Conclusion:(2 spaces) Tie together discussion of results and state whether the criterion was met.

Issue(s):

o(F4) Write a brief, one full sentence description of each issue. Cite Form 2s if the criterion was not met. Write None, if the criterion was met.

ORR ASSESSMENT FORM 1

FUNCTIONAL AREA: EP	OBJECTIVE EP.2, Rev. 2 DATE: October 12, 1994 PAGE NO. 2	CRITERIA MET	
		YES	NO X

OBJECTIVE: A baseline compliance status review of DOE Orders 5500.1B, 5500.2B, 5500.3A has been performed. Noncompliance items have been addressed.

Criteria

All noncompliance issues are adequately addressed by DOE approved compliance schedule approvals (CSA) or exemptions. The CSAs include an adequate technical basis and schedule for attaining compliance. (DP-AP-202)

Compensatory measures that are specified in the CSAs are adequately implemented. (DP-AP-202)

Approach

Record Review: Review order compliance packages for the listed orders, including all applicable CSAs and exemptions.

Interviews: For orders that are not fully implemented, interview management personnel to ensure they are aware of this noncompliance and action necessary to fully implement the order requirements.

Shift Performance: Where appropriate, observe the implementation of any specified compensatory measures within the facility to determine their effectiveness.

Records Reviewed:

- 5500.1B-STCS-93-016
- 5500.1B-CSA-94-123, Rev.1
- 5500.2B-CSA-93-072
- 5500.3A-CSA-93-005
- 5500.3A-CSA-93-006
- 5500.3A-CSA-93-024
- 5500.3A-CSA-93-001, Rev. 2
- 5500.7B-STCS-93-010
- 5500.7B-STCS-93-015
- 5500.3A-CSA-93-007A
- 5500.3A-CSA-94-127

<u>Interviews Conducted</u>:

- o Emergency Services Manager NMPD/Reactors
- o Manager of Emergency Services Technical
- o Administrative Assistant to Operations Management
- o Lead Emergency Preparedness Coordinator
- o DOE Area Representative EP
- o Emergency Management Preparedness Coordinator
- o Emergency Management Preparedness Coordinator
- o Shift Advisor on loan to Emergency Planning
- o Administrative Assistant to Operations Management

<u>Shift Performance Evolution</u>: Facility DOE-HQ-ORE Drill

<u>Discussion of Results:</u>

Records Reviewed: The Emergency Preparedness Program for the Facility (the original used the name of the facility) was reviewed to ensure that the emergency plan and implementing procedures and instructions for the Facility, and applicable portions of the site plan, complied with or have Compliance Schedules Approvals (CSAs) for DOE 5500 Series Orders. The following DOE 5500 Series Order Compliance Packet CSAs were reviewed:

XXX-DOE-5500.3A-CSA-93-007A; Personnel accountability was demonstrated for the facility personnel during the Emergency Preparedness Drill X-F Facility DOE-HQ-ORE Evaluated Drill [. . . "must be preformed in 30 minutes not to exceed 45 minutes" . . . 5500.3A.11.c.(6)(c)]. The Facility has implemented personnel accountability in procedure "Personnel Accountability" [EPIP-XXXX-203 Rev. 2] using a newly established manual badge system.

Another issue of this CSA, is personnel accountability for Outside Facilities, XXX-F, XXX-F, and the area which uses a supervisor accountability system . The supervisory accountability system is not consistently proceduralized for the facility. In addition, neither the manual badge system nor the supervisor accountability system have been found reliable for personnel working on the roof. A facility compensatory measure is visitors and personnel are required to respond to direction from the AEC. Also, personnel working on the roof are required to notify the Control Room when entering and exiting. A facility procedure addressing the above points will ensure a consistent approach to Area accountability.

Offsite Response Interfaces: Offsite Response Interface is the responsibility of the Site Emergency Preparedness Organization, it is not an issue for Emergency Preparedness Organization. XXX-DOE-5500.2B-CSA-93-072 for Consolidated Emergency Response Facility is a site not and a facility issue.

Notification: XXX Area and the Site ERO has adequate communication networks.

Medical Support: The area has adequate medical support.

Recovery and Reentry: Adequate procedures exist for Reentry [Emergency Exposure Guidelines, EPIP-XXXX-202 Rev. 2; Personnel Accountability, EPIP-XXXX-203 Rev. 2; Emergency Response Team Dispatch, EPIP-XXXX-201, Rev. 2] and Recovery [Recovery, EPIP-XXXX-206 Rev.2] Operations at the facility.

Public Information: Public Information is the responsibility of the Site Emergency Preparedness Organization, it is not an issue for this facility's ERO.

Training: XXX is not in full compliance with systematic and performance based training requirement [5500.3A.11.c(11)(b)(1)]. CSA, XXX-DOE-5500.3A-CSA-94-127, schedules compliance with this requirement 9/30/95.

Interviews: All interview comments are included in the Records Review section.

Shift Performance: XXX Facility DOE-HQ-ORE Drills (see TR.3 for comments).

<u>Conclusion:</u> All XXXX non-compliance issues have Compliance Schedule Approval agreements. Facility CSAs for hazards assessment, Emergency Action Levels (EALs), and EPZ have expired and are addressed in a finding. The compensatory measures for the CSAs provide an adequate level of protection for the health and safety of workers and the public due to their conservative nature.

The criteria for this objective have not been met.

<u>Issue(s):</u>

- o Compliance Schedules Approvals (XXX-DOE-5500.3A-CAS-93-005, 006,024) committed to complete a facility Interim Hazards Assessment leading to a compliant (EAL) procedure has not been completed on schedule (EP.2-1). (Pre-start)

Inspector: ______________ Team Member	Approved: ______________ Team Leader

SAMPLE

INSTRUCTIONS FOR COMPLETING
ORR DEFICIENCY FORM 2

Objective:	Criterion:	Finding____ Observ.	Prestart____ Post-Start	Issue No.: Date: 10/12/94

ISSUE: (2 spaces) Write a brief, one full sentence, description of the issue. Reference the corresponding Form 1. Use the present tense.

REQUIREMENT: (2 spaces) Write the requirement, usually cited in the CRAD, for the finding.

REFERENCE(S): (2 spaces) Be specific. Include section and paragraph, if possible, of all references that support the conclusion that existing conditions are deficient.

DISCUSSION: (2 spaces) Describe the issue. The discussion should be self-explanatory and support the conclusion. Use the present tense. Cite specific example(s) for a generic issue.

CONCLUSION: (2 spaces) State that the criteria for this objective were not met. State whether it is a pre-start or a post-start finding. Made reference to the corresponding Assessment Form 1.

Inspector:____________	Approved:____________ Team Leader

SAMPLE
ORR DEFICIENCY FORM 2

Functional Area: EP	Objective No.: 2	Finding X Observe.	Pre-Start X Post-Start	Issue No.: EP.2-1 Date: 8/24/94

ISSUE: XXX Area Compliance Schedules Approvals (XXX-DOE-5500.3A-CAS-93-005, 006,024) committed to complete a facility Interim Hazards Assessment leading to a compliant Emergency Action Level (EAL) procedure has not been completed on schedule (August 22, 1994).

REQUIREMENT: EALs are require by DOE Order 5500.3A,11.b.(2)[2] and 5500.3A,11.c(3)[2] ".., the specific criteria used to recognize and categorize events, must be developed for the spectrum of potential Operational Emergencies identified by the hazards assessment."

REFERENCE(S): XXX-DOE-5500.3A-CAS-93-005; XXX-DOE-5500.3A-CAS-93-006; XXX-DOE-5500.3A-CAS-93-024; XXX-940093 memorandum, X-Area USQ Resolution Matrix.

DISCUSSION: Compliance Schedule Approval (CSA) agreements were approved for required upgrades to the Emergency Preparedness Program. Due to a variety of circumstances, the EAL procedure was not developed in conformance with the agreed to schedule. The CSA compensatory actions remain in place while a new CSA is evaluated. Reportedly, XXXX (CONTRACTOR) has proposed a new schedule for compliance with an end date of 10/31/94.

CONCLUSION: This order compliance issue should be evaluated and a new schedule accepted by DOE. Pending resolution of this matter, the agreed upon compensatory measures should continue. Resolution of this matter prior to restart is considered appropriate due to the significance of the topic and the need for Headquarters agreement on the delay in achieving compliance.

Inspector: ____________________ Team Member	Approved: ____________________ Team Leader

CONCLUDING MATERIAL

Review Activity:

Preparing Activity:
DOE-DP-31

DOE
DP-21/23/25/31/33
EH-11/30/63
EM-23
NE-44
ER-8.1

Field Offices
AL
CH
ID
NV
OR
SR
RF

Project Number:
MISC-OO21

National Laboratories
INEL

Area Offices
Amarillo Area Office
Kirtland Area Office

DOE F 1300.3 (01-94)	**U.S. DEPARTMENT OF ENERGY** **DOCUMENT IMPROVEMENT PROPOSAL** *(Instructions on Reverse)*	OMB Control No. 1910-0900 OMB Burden Disclosure Statement on Reverse

1. Document Number	2. Document Title

3a. Name of Submitting Organization	4. Type of Organization *(Mark one)* ☐ Vendor ☐ User ☐ Manufacturer ☐ Other (Specify: ____________)
3b. Address *(Street, City, Zip Code)*	

5. Problem Areas (Attach extra sheets as needed.)

a. Paragraph Number and Wording

b. Recommended Wording

c. Reason/Rationale for Recommendation

6. Remarks

7a. Name of Submitter *(Last, First, MI)*	7b. Work Telephone Number *(Include Area Code)*
7c. Mailing Address *(Street, City, State, Zip Code)*	8. Date of Submission

INSTRUCTIONS: In a continuing effort to improve the U.S. Department of Energy (DOE) Technical Standards, this form is provided for use in submitting comments and suggestions for improvements. All users of DOE Technical Standards are invited to provide suggestions. This form may be detached, folded along the lines indicated, taped along the loose edge (DO NOT STAPLE) mailed to the address indicated or faxed to (615) 574-0382.

1. The submitter of this form must complete blocks 1 through 8.
2. The Technical Standards Program Office (TSPO) will forward this form to the Preparing Activity. The Preparing Activity will reply to the submitter within 30 calendar days of receipt from the TSPO.

NOTE: This form may not be used to request copies of documents, nor to request waivers, deviations, or clarification of specification requirements on current contractors. Comments submitted on this form do not constitute or imply authorization to waive any portion of the referenced document(s) or to amend contractual requirements.

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