

## 2. Contractor Assurance System Assessments

### **Objective 2.0:**

**Contractors will be responsible for developing, implementing, and performing comprehensive assessments of all facilities, systems, and organizational elements, including subcontractors, on a recurring basis. (DOE O 226.1A, Attachment 1.2)**

**Criteria 2.1: The contractor assurance system includes a self-evaluation of compliance with contractually mandated requirements and performance objectives. (DOE O 226.1A, 2.d)**

### **Review Approach**

Review Contractors CAS self-evaluation process to determine if the self-evaluation was based on contractually mandated requirements and performance objectives (i.e., applicable laws, regulations, national standards, DOE directives, DOE-approved plans and program documents, site-specific procedures/manuals, and criteria and review approach documents). (DOE O 226.1A, 2.d)

Interview contractor managers to determine if CAS assessment activities are routinely monitored to ensure that implementation meets expectations.

**Criteria 2.2: Contractors have a rigorous and credible assessment program developed and implemented, which documents the performance of comprehensive assessments of all facilities, systems, and organizational elements, including subcontractors. (DOE O 226.1, CRD, Attachment I, 2)**

### **Review Approach:**

Review site plans and program documents to ensure that the scope and frequency of assessments has been specified and documented (e.g. quality assurance program). (DOE O 226.1, CRD, Attachment I, 2)

Review the scope and frequency of assessments documented to ensure that required assessments by applicable DOE directives are being performed (DOE O 226.1, CRD, Attachment I, 2).

Determine if environment, safety, and health; safeguards and security; cyber security; and emergency management programs are adequately assessed to determine the effectiveness of the program (this includes safety management programs that are credited in the safety basis for nuclear facilities). (DOE O 226.1, CRD Attachment I, 2).

**Criteria 2.3: Self-Assessment are periodically used to evaluate performance at all levels to determine the effectiveness of policies, requirements, and standards and the implementation status (DOE O 414.1C, Criterion 9, “Management Assessment” and DOE O 226.1, CRD, Attachment 1.2.a.)**

### **Review Approach**

Confirm that the assessments performed specifically include assessments of work activities using the *Assessment Criteria and Guidelines for Performing Assessments of Incorporation of Integrated Safety Management and Quality Assurance Principles Into Activity Level Work Planning and Control at NNSA Sites* issued on January 23, 2006, or its equivalent. (Note: All NNSA sites committed to routinely performing these assessments in Site Office Action Plans developed in response to DNFSB Recommendation 2004-1.)

Additional assessments that should be periodically performed by the contractor include:

- Assessments of safety systems using the *Model Assessment Criteria and Guidelines for Performing Phase II Assessments of Safety Systems at Defense Nuclear Facilities* issued November 30, 2001, or its equivalent;
- Assessments of Specific Administrative Controls using the *Criteria and Guidelines for Assessing Documentation and Implementation of Specific Administrative Controls at NNSA Sites*, issued June 9, 2008;

Verify that a documented basis exists for the frequencies at which assessments are performed, and that the basis includes considerations such as the associated risk, significance; hazards; uniqueness; complexity; past performance; consequences of failing to meet requirements associated with the program, process, or activity being assessed; suggested or required frequencies established in standards or regulations; or other pertinent factors.

Interview team leaders and review the documentation of completed assessments to verify that the assessments:

- were performance-based when appropriate and involved direct observation of activity/floor level hands-on work; implementation of processes, programs, and activities; and inspection of field conditions;
- evaluated institutional and safety management programs credited in the DSA (e.g., radiation protection, fire protection, criticality safety, industrial health and safety, quality assurance) that support work activities; and
- were performed at appropriate levels (i.e., worker level, facility level, and site level), and included all appropriate organizations and subcontractors to determine the effectiveness of processes and procedures that implement requirements and ensure the safety and efficiency of operations.

**Criteria 2.4: Management self-assessments or management assessments are performed by contractor management, and are developed based on the nature of the**

**facility/activity being assessed and the hazards and risks to be controlled. (DOE O 226.1, CRD, Attachment 1.2.a.(1))**

### **Review Approach**

Sample self-assessment reports to determine if contractors have assessed the implementation and adequacy of their processes, including analysis of the collective results of lower-level self-assessments. (DOE O 226.1, CRD, Attachment 1.2.a.(4))

Interview team leaders to find out if their assessment teams were given sufficient authority, management support, resources (funding, time, and personnel including subject matter experts), tools (e.g., CRADs, checklists, templates), and access to facilities, information, and personnel to allow for effective evaluations.

Verify that support organizations perform self-assessments of their performance and the adequacy of their processes. (DOE O 226.1, CRD, Attachment 1.2.a.(3))

**Criteria 2.5: Self-assessment results have been documented commensurate with the significance of and risks associated with activities being evaluated. (DOE O 226.1, CRD, Attachment 1.2.a.(5))**

### **Review Approach**

Sample review reports to determine if deficiencies have been accurately described and documented for evaluation and correction using formal issues management processes. (DOE O 226.1, CRD, Attachment 1.2.a.(5))

Confirm that CAS assessment results are formally documented and readily available to DOE line management, and that significant assessment results, issues, and deficiencies have been promptly reported to an appropriate level of responsible contractor and DOE management.

**Criteria 2.6: To support unbiased evaluations internal independent assessments have been performed by contractor organizations or personnel that have authority and independence from line management. (DOE Order 414.1C, Criterion 10, “Independent Assessment” and DOE O 226.1, CRD, Attachment 1.2.b.)**

### **Review Approach**

Review training records to determine if internal independent assessment evaluators have been appropriately trained and qualified and are knowledgeable of the subject being assessed. (DOE O 226.1, CRD, Attachment 1.2.b.(2))

Determine if internal independent assessments are staffed with dedicated contractor staff, members of external organizations, or both. (DOE O 226.1, CRD, Attachment 1.2.b.(3))

Verify that the personnel assigned to internal independent assessment teams were sufficiently independent from the organizations responsible for the performance of the work being assessed to ensure unbiased conclusions.

**Criteria 2.7: Internal independent assessments are formally planned and scheduled based on the risk, hazards, and the complexity of the processes and activities to be evaluated.** (DOE O 226.1, CRD, Attachment 1.2.b.(1))

### **Review Approach**

Determine if planned and scheduled internal independent assessments focus on individual activities and processes, and entire facilities or projects, and programs and management processes that are used by multiple organizations. (DOE O 226.1, CRD, Attachment 1.2.b.(4))

Determine if internal independent assessments were based on the performance and observation of work activities and the results of process implementation. (DOE O 226.1, CRD, Attachment 1.2.b.(5))