
4. Contractor Assurance System Issues Integration and Management

Objective 4.0

Contractors have a comprehensive, structured issues management system in place, that provides for timely and effective resolution of deficiencies. (DOE Order 414.1C, Criterion 3, “Quality Improvement” and DOE O 226.1A Attachment 1, Appendix A 5.)

Criteria 4.1: Program and performance deficiencies, regardless of their source, are captured in a system or systems that provide for effective analysis, resolution, and tracking. (DOE O 226.1A Attachment 1, Appendix A 5.a.)

Review Approach:

Review the issues management process to determine if the system meets the minimal requirements stated by the Order. As a minimum the issues management process must include a process to:

- Determine the risk, significance, and priority of deficiencies;
- Evaluate the scope and extent of the condition or deficiency (e.g., applicability to other equipment, activities, facilities, or organizations);
- Determine event reportability under applicable requirements (e.g., Price- Anderson Amendments Act, Occurrence Reporting and Processing System, security incident reporting);
- Identify root causes (applied to all items using a graded approach based on risk);
- Identify and document suitable corrective actions and recurrence controls, based on analyses, to correct the conditions and prevent recurrence;
- Identify individuals/organizations responsible for implementing corrective actions;
- Establish appropriate milestones for completion of corrective actions, including consideration of significance and risk;
- Track progress toward milestones such that responsible individuals and managers can ensure timely completion of actions and resolution of issues;
- Verify that corrective actions are complete;
- Validate that corrective actions are effectively implemented and accomplish their intended purposes, using a graded approach based on risk; and
- Ensure that individuals and organizations are accountable for performing their assigned responsibilities.

Determine if all program and performance deficiencies are being captured in an issue management system or systems.

Determine if contractor personnel who manage and perform assurance functions possess experience, knowledge, skills, and abilities commensurate with their responsibilities. (DOE O 226.1A, Attachment 1, 2.e)

Determine if the contractor has established and maintained qualification standards for personnel with oversight responsibilities. (DOE O 226.1A, Attachment 1, 2.f)

Criteria 4.2: Issues management provides a process for rapidly determining the impact of identified weaknesses and taking timely action to address conditions of immediate concern. (DOE O 226.1A Attachment 1, Appendix A 5.b.)

Review Approach:

Determine if a formal process has been established to develop compensatory measures or interim corrective actions (e.g., stopping work, shutting down activities, or revising a procedure) as soon as a condition is identified and communicated. (DOE O 226.1A Attachment 1, Appendix A 5.b.)

Determine if there is a process in place to analyze deficiencies, individually and collectively, and this process is used to determine if deficiencies are programmatic or systemic issues. (DOE O 226.1A Attachment 1, Appendix A 5.c.)

Determine if these tools are used by management to monitor progress in addressing known systemic issues to optimize the allocation of assessment resources. (DOE O 226.1A Attachment 1, Appendix A 5.c.)

Criteria 4.3: Contractors have in place an effective process for communicating issues up the management chain to senior management. (DOE O 226.1A Attachment 1, Appendix A 5.d.)

Review Approach:

Determine if their method of issues communication utilizes a graded approach methodology which considers hazards and risks. (DOE O 226.1A Attachment 1, Appendix A 5.d.)

Evaluate the communication process in place to determine if it provides sufficient technical information to allow managers to make informed decisions. (DOE O 226.1A Attachment 1, Appendix A 5.d.)

Determine if the process in place allows contractors and contractor employees to communicate and document dissenting opinions. (DOE O 226.1A Attachment 1, Appendix A 5.d.)

Determine if the process in place allows for issue resolution, to resolve disputes regarding oversight findings and other significant issues which must be implemented. (DOE O 226.1A Attachment 1, Appendix A 5.d.)

Determine if the process has in place provisions for independent technical reviews of significant issues. (DOE O 226.1A Attachment 1, Appendix A 5.d.)