

PAAA Working Group
ANNUAL REPORT TO THE DIRECTORS
(CY 2004)

1. Introduction

The primary focus of the Working Group is on nuclear/radiological safety in the context of PAAA enforceable regulations throughout the entire life cycles of facilities and activities. Price-Anderson relationships to other laws and regulations (e.g., DOT 49 CFR provisions) will be included in the scope of the Working Group to the extent necessary to assist in the understanding of the relationships and interfaces. Coordination with other EFCOG Working Groups is appropriate and encouraged, especially where the technical aspects of the other Working Groups relate to PAAA enforceable regulations.

The Price-Anderson Working Group is an Energy Facility Contractors Group (EFCOG) working group that focuses on nuclear/radiological safety regulatory activities. The purpose of the working group is to enhance communications and cooperation with the DOE Office of Price-Anderson Enforcement and to promote excellence at DOE facilities through the implementation of Price-Anderson Amendments Act (PAAA) nuclear safety laws and regulations, information sharing, and application of lessons learned.

The objectives of the Price-Anderson Working Group are to:

- Provide planning and actions necessary to achieve the overall objectives of the EFCOG in the area of nuclear/radiological safety regulatory activities.
- Promote, coordinate, and facilitate the active exchange of programs, practices, procedures, lessons learned, and other pertinent information on nuclear/radiological safety regulatory activities.
- Provide an avenue for communications to and from the DOE Office of Price-Anderson Enforcement on matters of enforcement programs, expectations, clarifications, complex-wide issues, and guidance.
- Promote training and learning on nuclear/radiological safety regulatory activities by sharing of management and technical information among DOE contractors through mechanisms such as workshops, task teams, and conferences.

The Price-Anderson Working Group operates within the scope of EFCOG. Areas that can benefit from focused and coordinated contractor attention are as follows:

- PAAA compliance assurance, including noncompliance reporting.
- Conduct of Enforcement Investigations, Conferences, and Program Reviews.
- Graded or tailored approaches to PAAA regulation implementation, including appropriate benchmarking activities.
- Working relationships with regulatory counterparts (e.g., DOE PAAA Coordinators and DOE-HQ Office of Price-Anderson Enforcement personnel).
- Addressing other issues as identified by the DOE Office of Price-Anderson Enforcement, EFCOG Executive Directors, EFCOG Sponsor, and/or the Working Group Strategic Planning Committee.

2. Membership

Membership in the PAAA Working Group varies from meeting to meeting, based on the topics being discussed, the location of the meeting, and the nature of the work being accomplished. In general, approximately 90 to 100 professionals attend our semi-annual meetings with about 85% claiming membership in the Working Group. For the most part, the PAAA Coordinators from each of the company sites within the DOE complex are a part of the PAAA Working Group membership. Additionally, subject experts in the area of quality assurance, rad control, safety analysis, root cause analysis, regulatory compliance, project management, and program management are important members of the Working Group.

Of the forty-five (45) member companies within EFCOG, approximately thirty (30) companies are represented on the PAAA Working Group. Those companies not represented are generally those with little or no direct Price Anderson reporting or liability issues.

The PAAA Working Group is sponsored by:

- Stephen M. Sohinki (stephen.sohinki@dp.doe.gov)
DOE Sponsor
Director, Office of Price Anderson Enforcement
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The EFCOG Executive Director sponsor:

- David B. Amerine (dave.amerine@ch2m.com)
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The PAAA Working Group is managed by:

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3. Objectives and Achievements

During the past year, the PAAA WG restructured its organization to better focus on the key issues important to our DOE Sponsoring Director and to be responsive to the needs and expectations of the EFCOG Directors. Leadership was shifted from a single WG Chair to two Co-Chairs and a leader assigned from the Strategic Planning Committee (SPC). Additionally, the SPC was expanded from four to six representatives.

The PAAA WG held two working sessions during CY 2004; one in the spring at the Nevada Site Office, and the other in the fall at Richland Washington. Both meetings were very productive and attended by approximately 90 representatives from companies throughout the DOE Complex. At both meetings, extensive presentations and discussions were held on Price Anderson issues, including Lessons Learned from recent Enforcement Actions, Enforcement Conferences, Program Reviews and other interactions with the DOE Office of Price Anderson Enforcement.

At the fall meeting, the WG transitioned to the new leadership and meeting structure, which included full day "Breakout sessions" on hot topics including, Extent of Condition Reviews, Causal Analysis, Trending, Nuclear Safety Excellence, Assessment Practices, and potential reporting thresholds under the proposed 10 CFR 851 rule.

Subsequent to the fall meeting, the PAAA WG published the "Assessment Guide," which was developed at the request of our DOE Sponsoring Director. The guide is in partial response to DOE's desire to move the Price Anderson program from 'Event Driven' noncompliances to 'Assessment Discovered' issues. Following its publication, the "Assessment Guide" was transferred to the ISM Working Group for continued updates and ongoing efforts to enhance the DOE Guidance on Assessments through the ISM Working Groups interaction with DOE staff responsible for that effort.

As a result of the breakout sessions at the fall WG meeting, two task teams were commissioned by the PAAA WG in the following areas:

- Extent of Condition Reviews
- Reporting Thresholds under 10 CFR 851

The task team dealing with Extent of Condition Reviews will also include some examples of effective causal analysis and trending tools. The team, led by Dick Steele from Sandia National Lab, is well represented by contractors throughout the DOE Complex, has formulated its scope of work, held several teleconferences and discussions with the staff of our DOE Sponsor, and plans to have a draft product ready for discussion at our Spring 2005 PAAA Working Group Meeting.

The task team handling Reporting Thresholds under 10 CFR 851 is led by Sandy English from Battelle-Pacific Northwest National Laboratory and Rich Hughes from Bechtel Hanford. The team solicited comments from member companies within the complex, compiled the comments and submitted them to DOE-OE during December 2004. It is anticipated that additional discussions and reviews will be conducted during the early part of CY 2005 and at the Spring 2005 PAAA WG Meeting.

In order to ensure positive lessons learned and enhance communications between PAAA Coordinators, all of the WG presentations from our most recent meeting are available on the EFCOG Website, along with publications that we have issued over the last several years. Additionally, the PAAA WG is soliciting comments and suggestions through an online questionnaire (at our website), in order to improve our effectiveness and enhance the value to participating companies and our DOE sponsor.

4. Planning for the Next Year

During 2005, the PAAA WG will monitor and report on the effectiveness of the new PAAA WG organization and the meeting structure initiated during 2004. Special emphasis will be placed on continuing to enhance and improve on our already effective working relationship with our DOE Sponsor.

Plans are already underway to coordinate the Spring 2005 PAAA WG Meeting with DOE's Annual PAAA Training Session for new PAAA Coordinators. The joint meeting is scheduled for the week of April 4, 2005. Joint meetings, training, and breakout sessions have been planned with our DOE sponsor and his staff.

In addition to the task team efforts already underway, the PAAA WG plans to focus on methods/processes/practices needed to move from an 'event driven' to an 'assessment driven' PAAA program. This could include a more thorough discussion of Management Systems, enhanced guidance on what constitutes a programmatic breakdown, the new order DOE 226.1, and the DOE implementation plan associated with DNFSB recommendation 2004-1. Additionally, we hope to review and discuss the process for measuring nuclear safety excellence and how we know if we're making a difference in regards to nuclear safety, along with a better method to capture and report data that measures nuclear safety performance.

The PAAA WG plans to continue its strong interaction and coordination with other EFCOG Working Groups. Both of the task team efforts described above have been developed and implemented with membership from other Working Groups, especially the ISM WG and several of its Subgroups. We will also continue our interaction with other groups within DOE and the contractor community as we deal with issues and topics of special interest to the success of the PAAA Program.

At this time, the PAAA WG has no plans to develop or commission any Subgroups to deal with ongoing program or process issues. However, we continue to evaluate this area and will make recommendations to the EFCOG Directors if we believe one or more Subgroups are warranted.

Although it has not been finalized, the PAAA WG hopes to hold its fall meeting at the Oak Ridge site. UT-Battelle has volunteered to host the meeting and we expect to finalize our plans during the Spring WG Meeting. It is anticipated that the fall meeting will be held in early to mid October 2005.

5. Lessons Learned

There were no significant problems encountered by the PAAA WG during 2004 that require resolution or further discussion. The WG continues to benefit from a strong DOE Sponsor and his commitment to our success and effectiveness. Increased participation by the EFCOG Sponsoring Director during 2004 contributed to the smooth transition of leadership and demonstrated, to both our customer and to our members, a positive and proactive commitment from the EFCOG Directors to the continued viability of the PAAA WG.

6. Effectiveness Evaluation

The PAAA WG continued its excellent interaction with the DOE Office of Price-Anderson Enforcement (DOE-OE) during calendar year 2004. The PAAA WG enhanced our working partnership with DOE by restructuring our meetings to effectively deal with key issues and hot topics important to both DOE-OE and the contractor community. During this period and with significant involvement of DOE-OE, we published the initial revision of the *Assessment Guide*, which highlights the attributes of an effective assessment program, discusses obstacles that could prevent the full implementation of this program and provides recommendations for overcoming these obstacles. The ultimate goal of this document and other efforts of the PAAA WG are to support DOE's desire to move the Price-Anderson program from an "event-driven" to an "assessment driven" process.

7. Recommendations

Based on the continued effectiveness of the PAAA WG, it is clear that its scope and mission should be continued into the foreseeable future. It is an example that typifies and exemplifies the intent and purpose of the EFCOG Charter and the overall purpose of its planned mission and goals. The PAAA WG will continue to monitor and report on its effectiveness and will adjust its approach, when necessary, to satisfy our DOE Sponsor and to meet the changing needs and expectations of our EFCOG member companies.