

## PAAA Program Review

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- ◆ Originally Scheduled for July - 2006
  - Two teams to review BEA, AMWTP and CWI
  
- ◆ Rescheduled multiple times
  
- ◆ Took Place Sept 13 and 14, 2006 and combined with an Enforcement Investigation
  
- ◆ Report Issued March 2007

- ◆ Self Assessment of PAAA Program Implementation
  - Annual review each project and functional area.
- ◆ CH2M Corporate Review
  - Used OE Program Review Criteria
- ◆ Reviewed Last 5 published Program Reviews
  - Identified Strengths
    - ◆ Strengths CWI Shared
    - ◆ Weaknesses CWI did not share
  - Identified CWI Vulnerabilities
    - ◆ Strengths CWI lacked
    - ◆ Weaknesses we shared

- ◆ Prepared and distributed guidance information Managers/SMEs in the following areas:
  - Issues Management
  - Cause Analysis
  - Self Assessment
  - Independent Assessment
  - Quality
  - Radiological Controls
- ◆ Each Manage/SME prepared presentation material to describe their process

# Preparation – Self Identified weaknesses



- ◆ Screening Weaknesses
  - Complex screening process
  - Potential that all issues not screened
  - Inconsistent screenings
  - Inadequate justification statements on screening form (1 screener)
  - Inaccurate screening conclusions (2 screeners)
    - ◆ Tunnel vision or stove pipe misconception (We found it before we used it so it's not a noncompliance)
- ◆ Over reliance on PAAA Coordinator (No fully trained back-up)
- ◆ Cause Analysis weaknesses
- ◆ RadCon Triennial Assessment adequate but not sufficiently self-critical

# Preparations – Improvement Actions



- ◆ Implemented a PAAA Improvement Plan
  - Screening Issues
    - ◆ Mentored problem screeners
    - ◆ Communicated assessment results to other screeners
    - ◆ Verified improved screening performance
  - Re-established Center of Excellence Meetings
  - Began monitoring and reporting metrics
- ◆ Strengthened cause analysis program

- ◆ ISMS Phase II certification
- ◆ 10 CFR 851 Implementation
- ◆ DOE Assessment of Rad Worker practices at accelerated retrieval Project (ARP)
- ◆ Notice of OE Enforcement investigation of ARP issues

# OE Program Review – Information Request



- ◆ Standard Information request per EGS-00-02
  
- ◆ Requested list of all issues with brief description and screening conclusion
  - OE looked at all of the issues screened as not a PAAA noncompliance
  - Follow-up asked for complete description and screening form for all suspect screenings (approximately 60)

# OE Program Review – Onsite Visit



- ◆ One and one-half days Program Review – one and one-half days Enforcement Investigation
- ◆ OE supplied list of the types of people they wanted to interview
- ◆ Allowed us to set schedule and agenda
- ◆ CWI and DOE-ID PAAA Coordinators sat in on all interviews
- ◆ OE allowed us to talk through presentation material and asked questions

- ◆ Thanked us for candid and open cooperation.
- ◆ Discussed results of interviews
  - Knowledgeable and well trained staff
  - Multiple examples of inaccurate screenings
  - Multiple examples of inadequate justification statements
  - Over reliance on single PAAA Coordinator
  - RadCon assessment program weaknesses.

## ◆ 9 Strengths

- Skilled, experienced Staff
- PAAA Coordinator has time to assess noncompliance related issues
- Large number of issues from variety of sources screened
- 15 NTS reports in first 18 months mostly self-identified
- Comprehensive corrective action program
- Effectiveness reviews performed on all NTS Issues
- Performance Assurance organization reviews all closure packages
- Substantial number of effective management assessments
- PEB assessments structured to provide rigorous reviews of

## ◆ 8 weaknesses

- Procedure and Forms need to be updated and corrected
- Consider minimum qualification for screeners
- Multiple screenings with inadequate justification for conclusion
- Multiple examples of incorrect determination of rule applicability as forms allow for too much interpretation
- RadCon organization had no effective mechanism for identifying trends or recurrences
- RadCon assessments not rigorous in that they were not identifying substantive issues
- PEB not governed by a requirements document
- A CWI Assessment identified assessment program deficiencies.

- ◆ Don't rely on a yearly assessment to identify issues with your program
- ◆ Information from Program Review affected perceptions during Enforcement Investigation (Rad Con Triennial Assessment)
- ◆ Be self critical in assessments
- ◆ Aggressively fix what you find
  - Correct process to prevent future problems
  - Correct previous problems.