

**U.S. DEPARTMENT OF ENERGY
NATIONAL NUCLEAR SECURITY ADMINISTRATION
NEVADA SITE OFFICE**

ORDER

NSO O 226.XC

**Approved: 10-27-10
Review Date: 10-27-14**

ASSESSMENT AND OVERSIGHT



**INITIATED BY:
Office of the Assistant Manager
for Site Operations**

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1. OBJECTIVE.

- a. This directive establishes the National Nuclear Security Administration (NNSA) Nevada Site Office (NNSA/NSO) process for conducting NNSA/NSO oversight of contractors/users, and documentation of those processes. This directive serves as the primary NNSA/NSO mechanism for implementing DOE O 226.1 and NA-1 SD 226.1. The objective of the directive is to ensure that Contractor Assurance System (CAS) and NNSA/NSO assessment and oversight programs are comprehensive and integrated.
- b. This directive is a complete re-write of the predecessor directive, and describes extensive changes to NNSA/NSO oversight processes resulting from:
 - (1) An initiative instituted by NNSA/NSO in Calendar Year 2009—the Nevada Enterprise (NvE) Governance Project¹.
 - (2) Expanded use of the enterprise Pegasus Information Management System (PIMS) by federal staff at NNSA/NSO.
 - (3) Removal of NNSA/NSO write access to the Contractor-Maintained Issues Management System (CaWeb) that had been used by both NNSA/NSO and the Management and Operating (M&O) contractor staffs since its initial standup in 2002. (**NOTE:** NNSA/NSO federal staff retain read and query access to CaWeb.)
 - (4) A significant change in oversight philosophy and approach, consistent with guidance provided by the NNSA Administrator²:

The hallmark to a successful and constructive “partnership” between federal and contractor entities for mission accomplishment is a well defined, well understood, and reliably functioning Line Oversight and Contractor Assurance System (LOCAS).
 - (5) Accordingly, this revision reflects the seamless integration of NNSA/NSO Line Oversight (LO) responsibilities with the M&O CAS that: (a) is certified by the M&O contractor parent organization(s) and NNSA/NSO; (b) is transparent (readily available) to NNSA/NSO as well as corporate executive leadership; and that (c) reflects a risk informed

¹ See the NvE New Governance Project Execution Plan, PEP-PMO-1003, Revision 0, dated 1/20/10.

² Memo, “NNSA Enterprise Re-Engineering Reform Initiative—LOCAS,” 12/22/09.

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management approach to oversight, based on objective evidence and measures of performance.

2. CANCELLATION. NSO O 226.XB, ASSESSMENT AND OVERSIGHT, dated 10-14-09.
3. APPLICABILITY.
 - a. This directive applies to all NNSA/NSO management and staff personnel engaged in work as defined in NSO O 111.X.³
 - b. As agreed and recommended by the NvE membership following the completion of an extensive analysis and Joint Oversight Requirements Review Board (JORRB) review process, this directive does not contain a Contractor Requirements Document.
4. DEFINITIONS.
 - a. Assessment. A review, evaluation, inspection, test, check, surveillance, or audit to determine and document whether items, processes, systems, or services meet specified requirements and perform effectively.⁴
 - b. CAS. The overarching management process that integrates an organization's management systems into a cohesive, mutually supporting whole that provides confidence that requirements will be met and enables contractor management to ensure that: (1) Workers, the public, and the environment are protected; (2) operational, facility, and business systems are effectively run and continuously improved; (3) acceptable performance outcomes are defined and mission objectives and contract requirements are met; (4) appropriate internal oversight of contract performance is provided; (5) contractor management is held accountable for these outcomes; and (6) level of trust is established and maintained between the Department of Energy (DOE)/NNSA and its contractor, which allows DOE/NNSA to revise its oversight function to leverage the processes and outcomes of the contractor.

³ Facility Security Surveys conducted by the Assistant Manager (AM) for Safety and Security (AMSS) represent equivalent and acceptable methods and are included in the NNSA/NSO Master Assessment Schedule (MAS).

⁴ NNSA Office of Defense Programs (NA-10), NA10-QAP-09-0001, Quality Assurance Program (Revision 1), December 2009, Attachment B.

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- c. Corrective Action. Action taken in response to an identified issue and intended to resolve the existing condition, introduce compensatory or remedial actions as necessary, and minimize the probability of a recurrence of the issue.
- d. CAS Certification. An NNSA mandated criteria to allow governance activities to occur. A prerequisite of the governance activity is a strong and effective CAS that can be relied upon to support federal oversight responsibilities. CAS certification applies only to the M&O contractor. Other contractors may have assurance systems that do not require CAS certification.
- e. Corrective Action Plan (CAP). A plan developed by the responsible contractor or assigned AM (for federal issues) for Priority Level 1 or 2 findings that define the actions to be taken to correct an identified issue, and the planned date of completion for those actions.
- f. Differing Professional Opinion (DPO). A documented record created when an employee's best professional judgment differs from that of a peer, other team members, or management. The DPO may be based upon any number of factors, such as an alternative interpretation of governing standards and requirements, disagreement with the interpretation of data, results, conclusions, or disagreement with those actions considered adequate to ensure safety or compliance.
- g. Executive Council (EC). Standing committee of senior NNSA/NSO managers and executives.
- h. Formal Assessments. Assessments approved by the NNSA/NSO EC or Management Systems Steering Panel (MSSP) and scheduled on the MAS. Formal assessments require assessment plans and final Assessment Reports (ASRP) that are approved by NNSA/NSO senior management.
- i. Functional Area. A grouping of activities or processes on the basis of their need in accomplishing one or more tasks⁵. NNSA/NSO functional areas and the responsibility (by AM or Office Director [OD]) for managing functional areas are described in the current revision of NSO O 111.X.
- j. Functional Area Representative. A federal staff member assigned responsibility for oversight and management of a functional area.

⁵ www.BusinessDictionary.com, definition of functional area, accessed 8/11/10.

- k. High Risk. A functional area or activity assigned a risk level ≥ 4 as determined by the risk ranking process.
- l. Informal Assessments. A type of Operational Awareness Activity (OAA) that is not a formal assessment scheduled on the MAS. A walk-through and surveillances are examples of informal assessments. Formal assessment plans are optional for informal assessments.
- m. Issue. A generic term that includes Findings, Opportunities for Improvement (OFI), and Noteworthy Practices (NP).
 - (1) Finding. An identified noncompliance with an established requirement that requires corrective action or response.
 - (2) OFI. An identified condition or practices, which while not a violation of an established requirement, may indicate less than optimal performance. An OFI is also used to document concerns or weaknesses identified by an assessment, for which no obvious requirement can be cited, but which the assessment team believes should be raised to the attention of senior management.
 - (3) NP. An identified condition or practice that exceeds requirements and demonstrates potential for beneficial use in wider applications.
- n. Issues Tracking System. A database and supporting software used to manage the tracking of issues and their corrective actions. NNSA/NSO utilizes PIMS to track issues identified during NNSA/NSO internal or external federal oversight activities.
- o. JORRB. Board composed of representatives of the NvE contractors and chaired by the NNSA/NSO Deputy Manager. The JORRB serves as a forum to review findings from external reviews and determine if/how they will be accepted for implementation.
- p. Lead Assessor. An individual assigned to manage the planning and execution of an assessment activity, whether conducted by a team or by a single individual. A Lead Assessor will also be assigned for externally completed assessments. (In this role, the Lead Assessor serves as the liaison and NNSA/NSO Point of Contact (POC) for the external assessment, and is responsible to ensure any issues are properly assigned for disposition in accordance with this directive). For security assessments, Functional Area Representatives serve as Lead Assessors.

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- q. Line Management. Collectively refers to Project Managers, Program Managers, Federal Project Directors, Federal Subproject Directors, and Task Managers.
- r. Low Risk. A functional area or activity assigned a risk level ≤ 3 as determined by the risk ranking process.
- s. MAS. A key document developed annually, and which describes formal assessments NNSA/NSO will perform during a fiscal year. The MAS is reviewed by NNSA/NSO Senior Management prior to approval to ensure emerging issues and defined performance metrics are being reviewed through oversight processes. The MAS is maintained under change control throughout the execution year.
- t. Management Assessment. An introspective self-analysis performed by an organization.
- u. NvE. The combination of NNSA/NSO and key contractors actively involved in the governance activities and responsible for providing input, recommendations, and support necessary to develop and successfully implement the new governance model.
- v. OAA. Day-to-day activities performed and documented by NNSA/NSO staff and management in the execution of their assigned responsibilities.
- w. Oversight Assessment. An analysis or review of contractor programs, processes, or products conducted by NNSA/NSO federal staff.
- x. Oversight Processes. Inspections, reviews, surveillances, surveys, operational awareness, and walk-throughs that evaluate programs and management systems and the effectiveness of the site assurance system.
- y. Performance Assurance Group (PAG). The AM for Site Operations (AMSO) organization manages and oversees implementation of the LOCAS program, federal reporting and implementation of LOCAS metrics, and integration with the M&O contractor.
- z. PIMS. A web-based business Information Management System used by NNSA/NSO to assign assessments to AMs and Lead Assessors, and to document completion and results of assessments and oversight activity.
- aa. Record. Books, papers, maps, photographs, machine readable materials, or other documentary materials, regardless of physical form or characteristics,

made or received by an agency of the United States Government under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations or other activities of the government or because of the informational value of the data in them⁶.

- bb. Risk. A qualitative or quantitative expression of possible loss that considers both the probability that an undesired event will occur and the consequences of that event should it occur.⁷ Based on the results of a formal risk ranking, activities and functions are grouped into one of five risk levels based on an unmitigated hazard analysis.
- cc. Safeguards and Security (S&S) Information Management System (SSIMS). An Issues Management System used by S&S staff for classified issues management. The SSIMS supplements the PIMS for classified issues.
- dd. Safety System Oversight Representative (SSOR). A designated NNSA/NSO federal staff member assigned to oversee contractor activities to validate operability of those safety systems that protect the public, workers, and the environment.
- ee. Shadow Assessments. A specific type of oversight activity performed by NNSA/NSO personnel to monitor the quality of contractor/user self-assessments.
- ff. Staff Representatives. A generic term that collectively refers to Functional Area Representatives, SSORs, Subject Matter Experts (SME), and Facility Representatives (FR).
- gg. SME. Federal staff possessing special expertise in an Environment, Safety, and Health (ES&H) program, for example, industrial hygiene, confined space entry, or lead abatement. SMEs are frequently assigned as Functional Area Managers (FAM).
- hh. Surveillance. A brief and limited informal assessment of a functional area, or of a portion of a functional area, typically performed and documented through the use of a checklist.

⁶ DOE O 243.1, Records Management Program (2/3/06), Attachment 3, Section 17.

⁷ NA-10, NA10-QAP-09-0001, Quality Assurance Program (Revision 1), December 2009, Attachment B, Section o.

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- ii. System-Based Oversight. Activities that assess performance through evaluating the processes, management systems, and the data/documentation generated by the contractor. Oversight includes a review of CAS metrics, sampling to validate systems data, and shadowing of self-assessments (or review of contractor self-ASRPs). The contractor provides data relative to system effectiveness through metrics, leading indicators, data analysis, and sustained performance. The federal staff verifies the reliability and accuracy of this data through periodic sampling or shadowing of operations under a system-based approach.
 - jj. Systemic Versus Transactional Assessment. Systemic for the purposes of the governance effort relates to a system or process, whereas transactional relates to specific actions within that system or process. The contractor is responsible to address specific execution aspects (transactional actions) to meet the requirements, and federal assessments will focus on oversight of the contractor assessment systems and processes for low hazard activities. This will prevent adding any implied requirements due to federal involvement but can only occur by relying on a contractor assurance and management system to address the detailed implementation and execution aspects of the mission scope.
 - kk. Transactional-Based Oversight. Activities that assess contractor performance through evaluating activities at the work, task, or facility level. Transactional reviews provide direct, independent federal oversight of activities, physical conditions, and contractor documentation.
 - ll. Transparency. The effectiveness of a process or document in providing sufficient detail such that a person technically qualified in the subject can understand and ensure adequacy without additional support from the originator.
 - mm. Walk-Through. An OAA utilized by NNSA/NSO to achieve a physical presence in the field and thereby acquire operational awareness perspective.
5. REFERENCES. The references contained in this directive intentionally do not include revision letters or dates. Specific references are to the most current, or successor, version applicable to NNSA/NSO activities.
- a. DOE O 225.1, ACCIDENT INVESTIGATIONS.
 - b. DOE P 226.1, DEPARTMENT OF ENERGY OVERSIGHT POLICY.

- c. DOE O 226.1, IMPLEMENTATION OF DEPARTMENT OF ENERGY OVERSIGHT POLICY.
- d. DOE M 231.1-1, ENVIRONMENT, SAFETY, AND HEALTH REPORTING MANUAL.
- e. DOE M 231.1-2, OCCURRENCE REPORTING AND PROCESSING OF OPERATIONS INFORMATION.
- f. DOE O 360.1, FEDERAL EMPLOYEE TRAINING.
- g. DOE M 360.1-1, FEDERAL EMPLOYEE TRAINING MANUAL.
- h. DOE O 414.1, QUALITY ASSURANCE.
- i. DOE G 414.1-1, MANAGEMENT AND INDEPENDENT ASSESSMENTS GUIDE FOR USE WITH 10 CFR PART 830, SUBPART A, AND DOE O 414.1C, QUALITY ASSURANCE; DOE M 450.4-1, INTEGRATED SAFETY MANAGEMENT SYSTEM MANUAL; AND DOE O 226.1A, IMPLEMENTATION OF DEPARTMENT OF ENERGY OVERSIGHT POLICY.
- j. DOE G 414.1-2, QUALITY ASSURANCE MANAGEMENT SYSTEM GUIDE FOR USE WITH 10 CFR 830, SUBPART A, QUALITY ASSURANCE REQUIREMENTS, AND DOE O 414.1C, QUALITY ASSURANCE.
- k. DOE G 414.1-3, SUSPECT/COUNTERFEIT ITEMS GUIDE FOR USE WITH 10 CFR 830, SUBPART A, QUALITY ASSURANCE REQUIREMENTS, AND DOE O 414.1, QUALITY ASSURANCE.
- l. DOE G 414.1-4, SAFETY SOFTWARE GUIDE FOR USE WITH 10 CFR 830, SUBPART A, QUALITY ASSURANCE REQUIREMENTS, AND DOE O 414.1, QUALITY ASSURANCE.
- m. DOE G 414.1-5, CORRECTIVE ACTION PROGRAM GUIDE.
- n. DOE O 425.1, VERIFICATION OF READINESS TO START UP OR RESTART NUCLEAR FACILITIES.
- o. DOE O 426.1, FEDERAL TECHNICAL CAPABILITY.
- p. DOE O 440.2, AVIATION MANAGEMENT AND SAFETY.

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- q. DOE P 450.4, SAFETY MANAGEMENT SYSTEM POLICY.
- r. DOE M 450.4-1, INTEGRATED SAFETY MANAGEMENT SYSTEM MANUAL.
- s. DOE G 450.4-1, INTEGRATED SAFETY MANAGEMENT SYSTEM GUIDE FOR USE WITH SAFETY MANAGEMENT SYSTEM POLICIES (DOE P 450.4, DOE P 450.5, AND DOE P 450.6); THE FUNCTIONS, RESPONSIBILITIES, AND AUTHORITIES MANUAL; AND THE DEPARTMENT OF ENERGY ACQUISITION REGULATION.
- t. DOE O 470.2, INDEPENDENT OVERSIGHT AND PERFORMANCE ASSURANCE PROGRAM.
- u. DOE M 470.4-1, SAFEGUARDS AND SECURITY PROGRAM PLANNING AND MANAGEMENT.
- v. NA-1 SD 226.1, LINE OVERSIGHT AND CONTRACTOR ASSURANCE SYSTEM.
- w. NSO O 111.X, FUNCTIONS, RESPONSIBILITIES, AND AUTHORITIES.
- x. NSO M 414.X-1, QUALITY MANAGEMENT SYSTEM.
- y. NSO O 421.X1, NUCLEAR FACILITY SAFETY MANAGEMENT.
- z. NSO O 426.1, TECHNICAL QUALIFICATION PROGRAM PLAN.
- aa. NSO M 426.X-1, SAFETY SYSTEM OVERSIGHT PROGRAM.
- bb. NSO O 442.X, DIFFERING PROFESSIONAL OPINION.
- cc. NSO M 450.4-X, INTEGRATED SAFETY MANAGEMENT DESCRIPTION.
- dd. NSO O 470.X1, FACILITY SECURITY SURVEY CORRECTIVE ACTION PLANNING.
- ee. NAP-5, POLICY LETTER FOR STANDARDS MANAGEMENT, or the documents used to implement them.
- ff. DOE-STD-1063-2006, *Facility Representative Program*.
- gg. NA-10, *Quality Assurance Program*.

hh. QC-1, DOE/NNSA, *Weapon Quality Policy*.

6. CONTACT. Questions concerning this directive should be addressed to PAG, AMSO, at (702) 295-4752.



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APPENDIX A

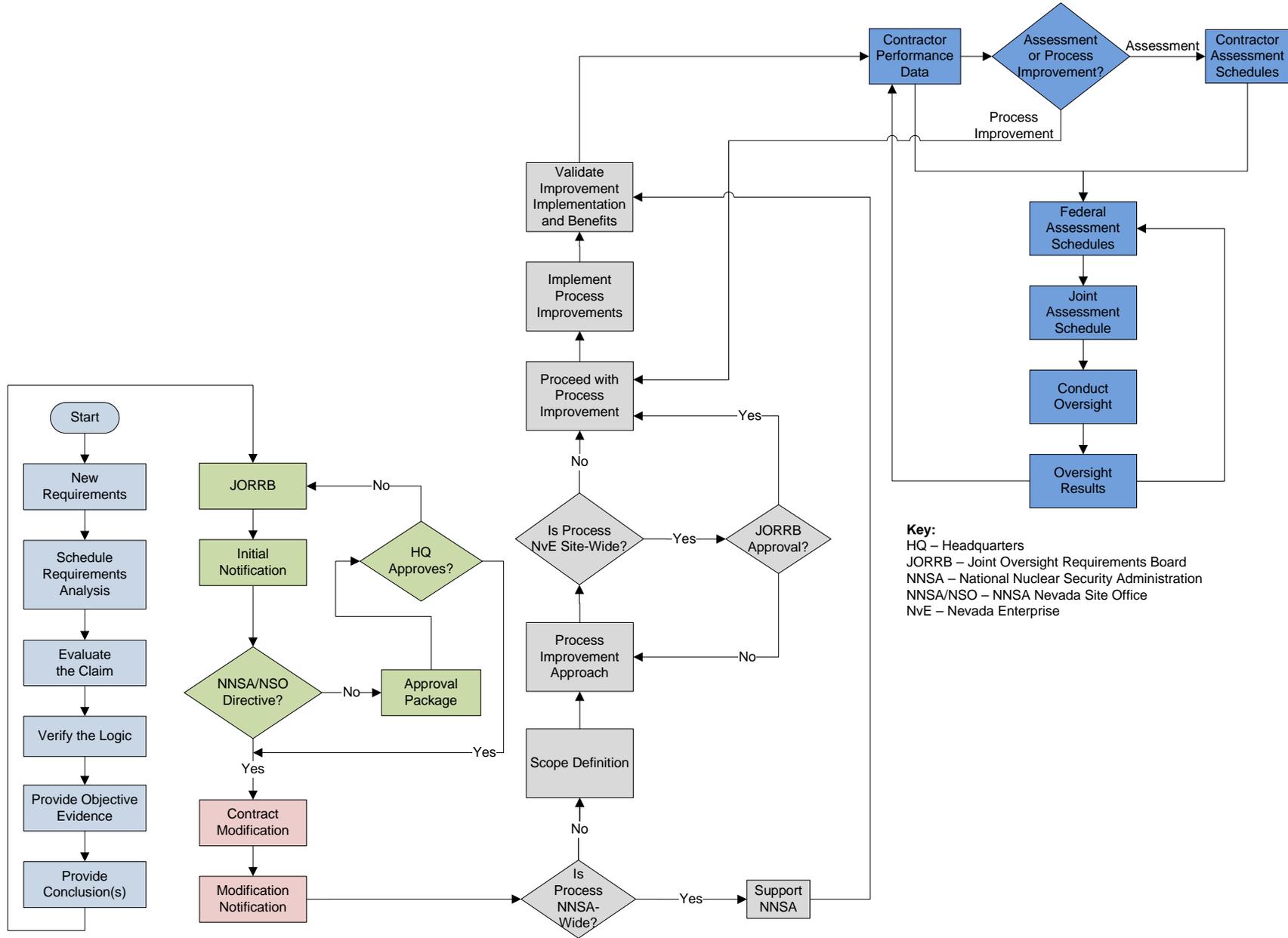
PROGRAM OVERVIEW

1. INTRODUCTION-THE NvE OVERSIGHT MODEL.

- a. The NvE oversight model uses a risk informed, data driven approach to ensure safe and effective performance of mission objectives, and provides the approach and method of implementation of oversight within the NvE.
- b. The model requires and relies upon contractors to continually self-assess performance through the use of objective data, such as issues management, lessons learned, and assessment results. Contractors are expected to continuously and rigorously analyze these data to identify and track positive and negative trends, and to use the results of analysis to improve performance and mission delivery effectiveness. Performance is tracked and reported through a transparent set of metrics that undergo ongoing contractor and federal review. The model includes an emphasis on identifying and resolving issues early before they result in an adverse event or a more systemic problem. This suite of practices and processes constitute a CAS.
- c. The model combines federal LO and contractors CAS processes and data to provide an integrated method for assuring that facilities, projects, and activities are conducted safely, in compliance with requirements, and in accordance with mission needs.
- d. The model provides principles by which federal and contractor staff will implement oversight, and describes the framework for the measurement of performance by contractors and the oversight of performance by federal staff. This framework is based on risk informed decisions. Higher risk facilities, projects, and activities receive more transactional (direct) oversight by federal staff while system based (indirect) oversight is provided where there is less risk.
- e. This approach allows for federal staff to focus on high-risk and mission critical operations through transactional oversight. Lower risk operations receive primarily system-based oversight where contractors self-evaluate and analyze performance and provide specific, measurable, actionable, reliable, and timely metrics that allow for transparent oversight.
- f. The model for oversight is designed so that contractors can maintain systems for assessing performance against requirements. Issues are identified and

addressed within the contractor's process along with OFIs. This assurance system is transparent to contractor management and to the federal oversight staff to allow the monitoring of performance based on contractor evaluation, analysis, and metrics. Assessment schedules are adjusted as needed based on performance.

- g. Oversight results are factored into the contract or CAS/performance process, and analysis of these results is used to develop site-wide lessons learned and improve performance.
- h. During execution of the model, assessments and oversight activities are conducted. The results become data that are incorporated into tracking/trending reports as part of the analysis of current process issues.
- i. The oversight model is integrated into the entire NvE governance process.
- j. The oversight model includes revised processes for managing new DOE/NNSA requirements that affect NNSA/NSO or NNSA/NSO contractors. Figure 1 portrays how new requirements are managed under the NvE Oversight Model. The process flow shown in Figure 1 depicts how new requirements are evaluated, reviewed, and approved; introduced into affected contracts; how implementation processes are developed; and finally incorporated into the assessment schedules.



Key:
 HQ – Headquarters
 JORRB – Joint Oversight Requirements Board
 NNSA – National Nuclear Security Administration
 NNSA/NSO – NNSA Nevada Site Office
 NvE – Nevada Enterprise

Figure 1—Requirements Management Under the NvE Oversight Model

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2. PRINCIPLES. Contractor systems assess safety, compliance, and performance to provide assurance of safe, compliant, and successful implementation of their mission.
 - a. Contractors use leading metrics that are transparent to the federal staff to demonstrate performance and drive improvement.
 - b. Federal oversight priorities and assessment schedules are developed to focus on high-risk/low-performance areas and are based on contractor performance, external reviews, the results of contractor and NNSA/NSO trending/analysis, operational awareness results, and assessment results.
 - c. Federal staff monitor's contractor performance through metrics review and by ensuring contractor systems are properly evaluating performance.
 - d. High risk activities receive transactional oversight from federal staff.
 - e. Low risk activities receive system-based oversight unless contractors identify areas of poor performance requiring transactional oversight.
 - f. Contractor corporate oversight will be used to further ensure effective contractor implementation.
 - g. A combined assessment schedule is developed that includes federal and contractor assessments and identifies transactional and shadow assessments.
3. FRAMEWORK. The oversight framework is based on three assumptions:
 - a. LO is a federal function used to evaluate contractor performance. This is done through maximum use of contractor data/results to enable targeted oversight based on risk.
 - b. Transparency will be based on verifiable data and results to demonstrate CASs are fully functional.
 - c. CASs will provide sufficient data and performance metrics to establish and maintain a level of confidence and trust with NNSA/NSO, which allows for a focus on systemic rather than transactional oversight as the basis.
4. RISK-INFORMED OVERSIGHT.
 - a. Risk-informed oversight was developed to determine the base risk for NNSA/NSO functional areas and determine the appropriate level of oversight

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based on risk mitigation. The model takes into consideration all assessment activities through a structured, defined manner and determines the oversight plan for the upcoming fiscal year based on risk.

- b. The model is based on the following guiding principles:
 - (1) Oversight is an essential aspect of maintaining a successful and efficient site office.
 - (2) The goal of risk-informed oversight is not to reduce oversight but to ensure that the appropriate amount of oversight is applied to the correct areas based on risk. This enhances effective use of resources and allows for application of fewer resources in areas of positive performance while focusing more oversight on areas of negative performance.
 - (3) NNSA/NSO has limited resources, and as such, enhanced oversight is an important management tool in assuring that resources are deployed in a manner that achieves maximum effectiveness.
- c. The base risk is determined by using a structured process to determine the inherent risk for any given functional area. The functional area list has been standardized between contractors, laboratories, and NNSA/NSO to facilitate data collection and analysis. Contractors determine the risk for each applicable functional area and provide the results of that analysis, including planned future oversight activity, to NNSA/NSO. For each functional area, an annual analysis is then performed by the appropriate NNSA/NSO AM (which includes the results of contractor risk analysis) to determine the risk of an adverse event on a functional area, cost, and/or mission.
- d. The base risk determined through the NNSA/NSO risk ranking process results in risks grouped into one of five bands (1 to 5). Risk bands 4 and 5 are defined as high risk, while risk bands 1-3 are low risk activities. Functional areas determined to be high risk will receive primarily transactional oversight from NNSA/NSO, while low risk activities receive primarily system-based oversight and less transactional oversight. The results of the annual risk analysis and ranking are used to develop the NNSA/NSO Assessment Implementation Plan (AIP) and MAS for the coming fiscal year.

5. RESPONSIBILITIES.

a. Federal.

- (1) Monitoring NvE contractor performance through metrics and review of contractor data.
- (2) Monitoring CASs for effectiveness including assessments and issues management.
- (3) Shadowing contractor assessments.
- (4) Performing transactional assessments in areas where contractors and/or federal staff identify weak performance.
- (5) Conducting OAAs.

b. Contractor.

- (1) Implementation of effective CASs.
- (2) Obtaining certification of M&O CAS.
- (3) Defining NvE CASs.
- (4) Implementing effective CAS processes.
- (5) Trending and analysis of issues.
- (6) Assessment of performance against metrics to ensure effective management.
- (7) Providing complete transparency of Issues Management Systems.
- (8) Effective management of risk with regard to safety, compliance, and success of specific missions.

6. KEY SUCCESS FACTORS.

- a. Expectations for oversight are well defined for contractors and federal staff.
- b. NvE contractors have defined their CASs.
- c. Contractors have developed necessary elements of the CAS (such as metrics).

- d. Metrics are used to demonstrate performance and drive improvement.
- e. Transparent Issues Management Systems are implemented at the contractor level.
- f. Systems are made electronically available to NNSA/NSO.
- g. An effective trending system is developed for NNSA/NSO and contractors.
- h. A standard list of functional areas has been established for risk assessment.
- i. A combined federal and contractor assessment plan and schedule is developed and executed.

7. THE ROLE OF LO.

- a. The inherent governmental responsibility to provide rigorous, informed oversight of contracted work conducted throughout the NvE is not diminished in the NvE oversight model. However, the methodology employed by federal staff and management to provide that oversight is substantially altered. Under the model federal staff rely more heavily on CAS data (especially for lower risk work), supplemented by documented OAAs and third party Independent Assessments (IA), to perform the requisite oversight. Federally conducted formal assessments are planned, scheduled, and performed. However they are fewer in number, are planned and scheduled annually via a structured, documented, and risk informed process, and may be combined with contractor assessments via shadowing or jointly conducted reviews.
- b. While contractor self-evaluations, reported and documented as CAS data and metrics, are relied upon to a greater degree by federal staff such data is not merely accepted at face value. Rather, the contractor is required to establish and demonstrate the use of CAS data to effectively manage work. This demonstration includes certification by the contractor parent organization following a rigorous assessment of CAS implementation and effectiveness, as well as an independent federal review conducted to confirm the conclusions of the contractor and parent organization reviews. Once certified, confirmed, and fully operational, federal staff confirm the continuing reliability of CAS data through sampling, observing, and reviewing selected contractor work and comparing the observations gained against the information reported in the CAS data.

- c. The LO component of the oversight model relies upon four distinct elements: CAS, OAAs performed by federal staff, formal federal assessments, and external IAs.
- (1) CAS.
- (a) A contractor's CAS encompasses all nuclear safety; ES&H; S&S; cyber security; emergency management; environmental management; and business management activities designed to:
- 1 Identify deficiencies and nonconformances.
 - 2 Report deficiencies to the responsible managers and authorities.
 - 3 Implement effective corrective actions.
- (2) OAAs.
- (a) Operational awareness, used in conjunction with data derived from CAS processes and formal federal assessments, serves as the foundation for NNSA/NSO management and staff to make informed decisions regarding federal oversight of contractor/user activities. Operational awareness consists of the day-to-day activities performed by NNSA/NSO federal personnel in the execution of their assigned responsibilities, with special focus on higher-hazard operations. Such activities may include:
- 1 Attendance at meetings or briefings involving contractor/user personnel related to planning and execution of work.
 - 2 Facility or area walk-throughs by NNSA/NSO personnel to monitor specific contractor/user activities or to gain information on program, project, or facility status.
 - 3 Completion of field surveillances that provide a "snapshot" of the health of a functional area.
 - 4 Review of contractor/user documents related to work scope, costs, schedules, and work processes.
 - 5 Review of contractor/user internal assessments, program reviews and reports, performance metrics, and occurrence report.

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- 6 Reviewing results of independent or external assessments of the contractor/user.
 - (b) OAAs are conducted by NNSA/NSO personnel to maintain cognizance of overall facility activity status, major changes planned, and overall safety posture.
 - (c) Shadow Assessments. NNSA/NSO implements shadow assessments as type of OAA. Shadow assessments are performed by federal personnel to monitor the quality of contractor/user performed self-assessments. Shadow assessments contribute to the basis for NNSA/NSO's confidence in the contractor's CAS.
- (3) Formal Federal Assessments.
- (a) NNSA/NSO conducts formal assessments on selected contractor activities, functions, and facilities. These assessments are identified by AMs each year using a structured, risk-informed process, described in the AIP, then assigned and tracked through execution using the NNSA/NSO MAS and/or the Joint Assessment Schedule (JAS).
 - (b) NNSA/NSO also conducts formal management assessments on federal activities as required by DOE O 414.1 and the NNSA/NSO Quality Management System quality criteria,
 - 1 Criterion 9, Management Assessments. "Ensure that managers assess their management processes and identify and correct problems that hinder the organization from achieving its objectives . . ."
 - 2 Criterion 10, IAs. "Plan and conduct IAs to measure item and service quality and the adequacy of work performance and to promote improvement . . ."
 - (c) Regardless of type (federal or contractor), NNSA/NSO formal assessments are planned and documented reviews. The scope of each assessment is defined in an assessment plan, and typically consists of a balance of documentation reviews, personnel interviews, and observations of work activities, systems, programs, facilities, and work activities. The assessment plan is developed based on a combination of local operational awareness, CAS data,

and/or awareness of topics arising from external events or input (for example—lessons learned from other DOE/NNSA, government, or industry sources of information).

- (d) NNSA/NSO senior management may consolidate formal assessments in the interest of efficiency and to minimize impact on mission execution. Where appropriate for low risk and nonnuclear activity, and as determined by the use of approved and documented risk informed processes, coupled with demonstrated satisfactory contractor performance as provided by an approved and effective CAS, NNSA/NSO may fulfill oversight responsibilities through the use of alternate approaches, including observation or shadowing of equivalent contractor conducted assessments or independent third party assessments and reviews, jointly performing assessments with the responsible contractor, performing limited OAAs during a performance period, or any combination thereof,
- 1 Oversight Assessments. Assessments conducted by federal staff (either an individual or an assessment team) on contractor functions, activities, or facilities. The types of oversight assessments include the following:
 - a Functional Area Assessment. An assessment of a functional area with the scope identified by the assigned Functional Area Representative.
 - b Safety System Oversight Assessment. An assessment of a nuclear facility safety system with the scope identified by the assigned SSOR.
 - c S&S Survey. An assessment of the adequacy and effectiveness of Security Programs and Nuclear Materials Control and Accountability. Surveys include a thorough examination of policies and procedures to ensure compliance/performance with S&S directives and requirements. All approved (registered) facilities are subject to the compliance and performance segments of surveys. Guidance for conducting S&S surveys are found in DOE M 470.4-1 (Change 1).
 - d Project Review. A validation of scope, cost, and schedule of line item construction projects. Examples include Independent

Cost Estimates, external Independent Reviews, Independent Project Reviews, and Critical Decision Reviews. Guidance for conducting such reviews is found in the DOE 413.3 series of directives.

- e “For Cause” Review. An assessment conducted when circumstances indicate a breakdown in compliance or performance of contractor/user or NNSA/NSO programs, processes, or procedures. For cause reviews may be initiated in response to a specific event or an indication of adverse trends derived from performance data or a separate assessment.
- 2 NNSA/NSO self-assessments are conducted by federal staff (either an individual or an assessment team) on NNSA/NSO (federal) functions, activities, or facilities. Self-assessments include the following types:
- a Management Assessment. An introspective self-analysis performed by an organization.
- b Internal IA. An assessment of NNSA/NSO federal operations planned and performed by NNSA/NSO individuals not associated with the work being assessed.
- c Effectiveness Reviews. A specific type of internal IA required by DOE O 414.1, Attachment 4, Section 2d, in response to:
- Findings identified by the Office of Independent Oversight, and Emergency Management Oversight.
 - Judgments of need identified by Type A accident investigations.
 - Findings identified by the Office of Aviation Management; Office of Management, Budget, and Evaluation.
 - Other sources as directed by the Secretary or Deputy Secretary of Energy, including crosscutting safety issues.

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d Operational Readiness Reviews (ORR) and Readiness Assessments (RA). Specific assessments required for the startup or restart of DOE/NNSA nuclear facilities and activities.

(4) External IAs.

- (a) Assessments of NNSA/NSO or contractor/user programs, processes, or activities by organizations other than NNSA/NSO.
- (b) The timing and frequency of external IAs varies by fiscal year. Such assessments are included on the NNSA/NSO MAS. An NNSA/NSO Lead Assessor is assigned, who functions as the NNSA/NSO POC for the assessment team.
- (c) External IAs provide a valuable additional source of information as to the level of compliance, performance, or effectiveness of contractor/user or NNSA/NSO programs, processes, or activities. Results of external IAs are factored into the annual AIP/MAS development process by NNSA/NSO organizations.
- (d) External IAs may include (but are not limited to):
 - 1 NNSA Chief, Defense Nuclear Safety, periodic assessments of nuclear operations.
 - 2 Audits conducted by the DOE Office of Inspector General.
 - 3 Periodic reviews of Environment, Safety, Health, and Quality, and S&S functions by DOE, the Office of Health, Safety, and Security (HSS).
 - 4 Audits conducted by the Government Accountability Office.
 - 5 Assessments of NNSA/NSO business management processes by the NNSA Service Center (SC), Office of Field Financial Management.

d. Figures 2 through 4 describe the NNSA/NSO assessment and oversight process planning, execution, and tracking/trending phases.

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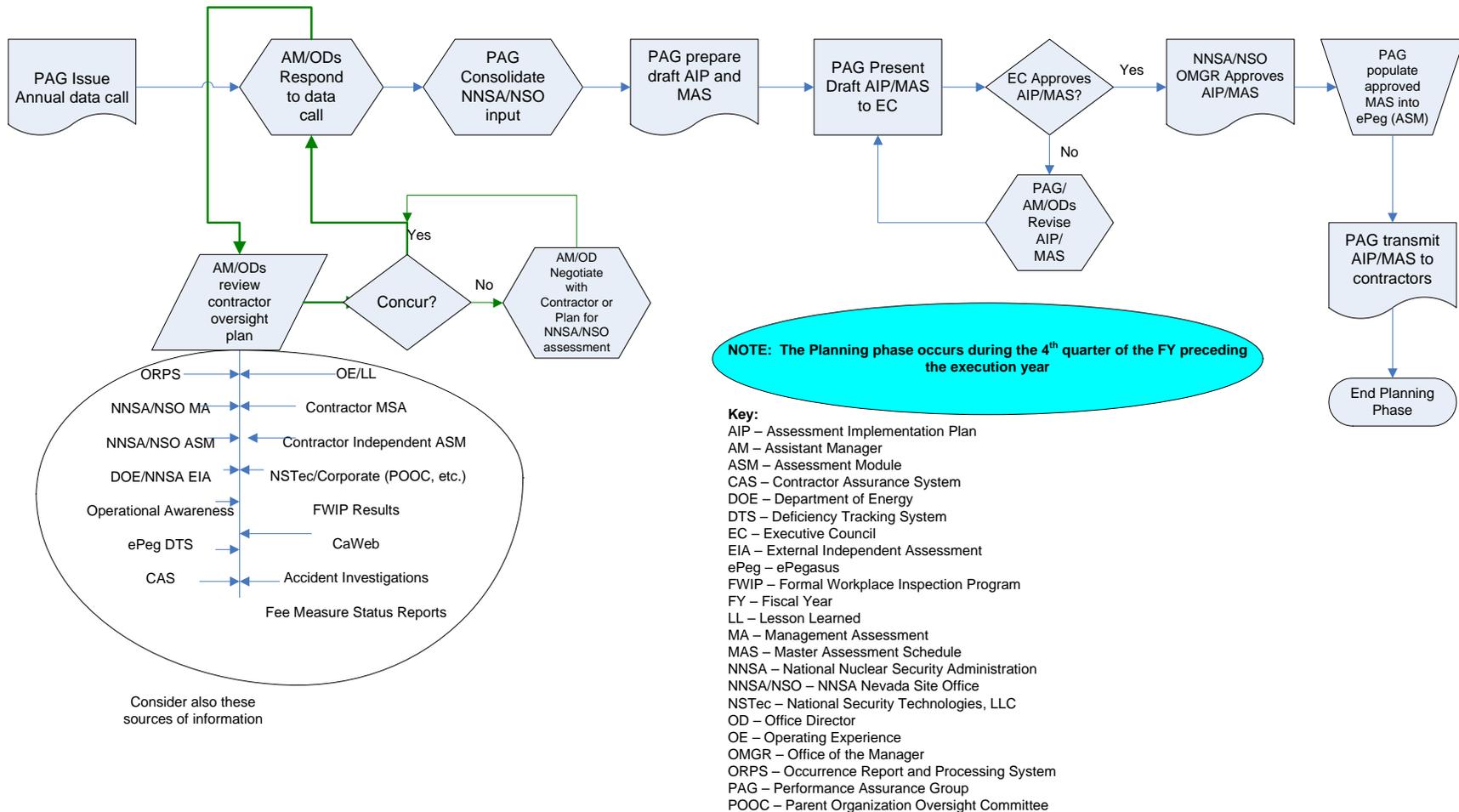


Figure 2—NNSA/NSO Assessment and Oversight Program Annual Planning Phase

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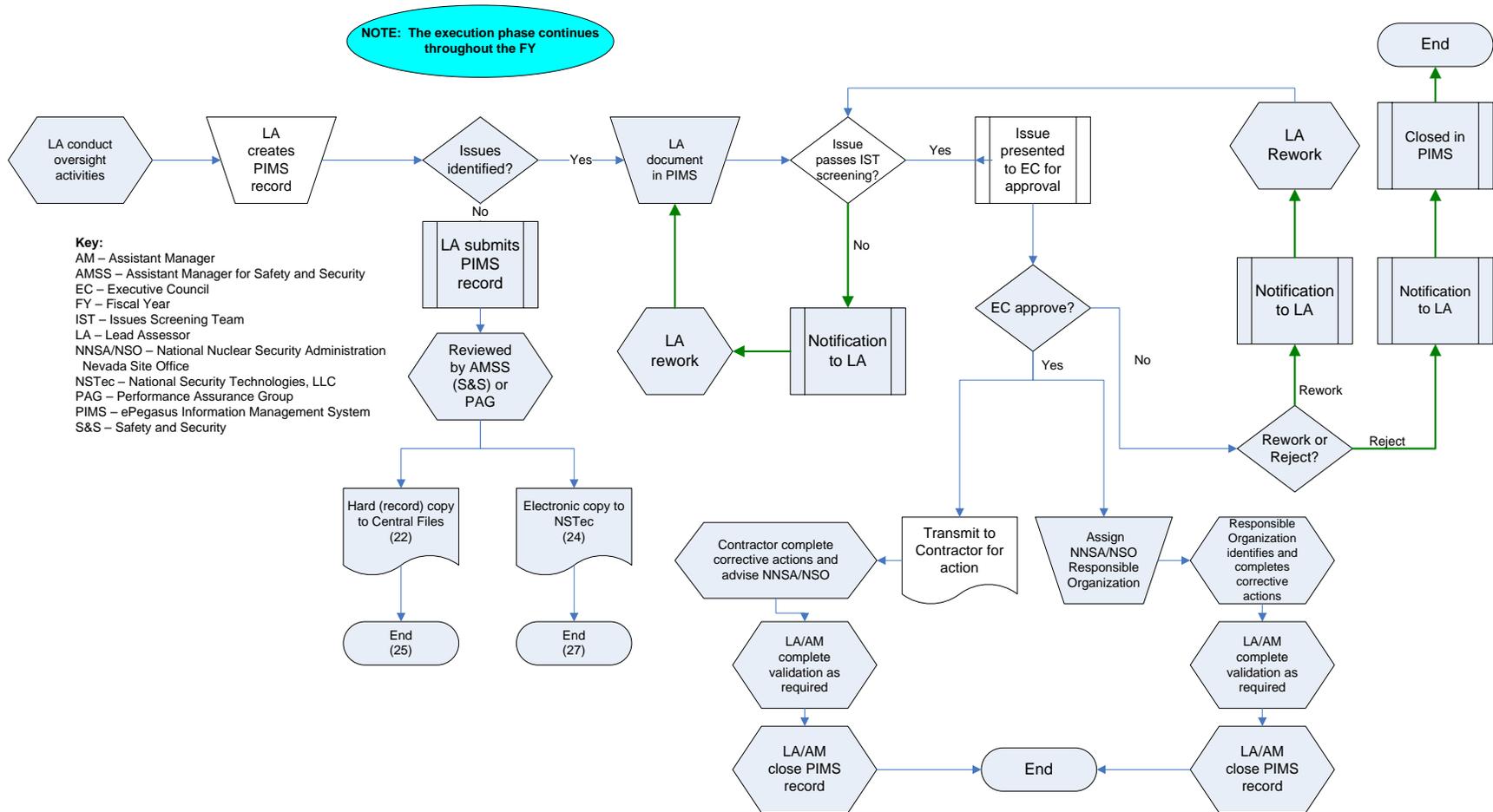


Figure 3—NNSA/NSO Assessment and Oversight Program Annual Execution Phase

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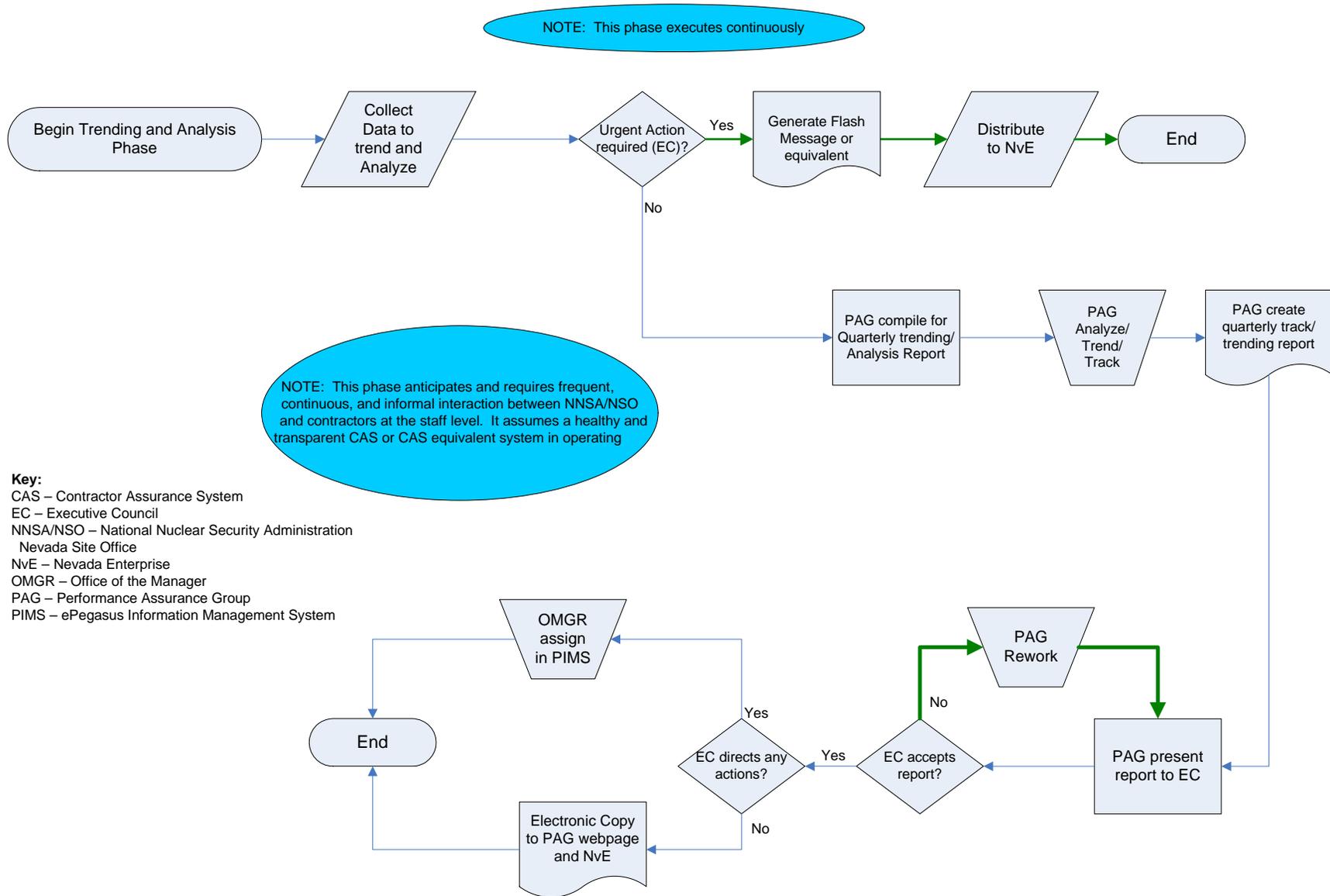


Figure 4—NNSA/NSO Assessment and Oversight Program Trending and Analysis Phase

- (5) Assessments/Operational Awareness Relationship. The timing and relationship between NNSA/NSO formal assessments and OAAs is depicted in Figure 5. OAAs occur as a component of oversight on an ongoing basis, with discrete formal assessments performed as described and scheduled in the annual AIP and MAS.



Figure 5—Timing and Relationship Between NNSA/NSO Formal Assessments and OAAs

8. REQUIREMENTS.

- NNSA/NSO Line Management.
 - The NNSA/NSO Assessment and Oversight Program is structured to encompass the assessment requirements of DOE, NNSA, and NNSA/NSO directives. The NNSA/NSO Directives Management Center maintains a listing of DOE, NNSA, and NNSA/NSO directives (“Directives Checklist”) that identifies the NNSA/NSO Office of Primary Responsibility for each directive.
 - CAS requirements apply primarily to DOE and NNSA M&O contractors, but may also apply to other contractors depending on their specific contract clauses. Contractors for which CAS requirements apply submit CAS program descriptions and significant updates to the NNSA/NSO Manager for review and approval.

APPENDIX BOPERATIONAL AWARENESS1. INTRODUCTION.

- a. Operational awareness refers to the day-to-day oversight activities performed and documented by NNSA/NSO staff and management in the execution of their assigned responsibilities.
- b. OAAs are typically routine and informal in nature, but provide an important contribution to the NNSA/NSO oversight strategy (when combined with an effective CAS).
- c. OAAs are documented by NNSA/NSO staff using the ASRP module of PIMS. Within that PIMS module, three types of OAAs have been defined:
 - (1) OAA (FR). Routine oversight activities performed by FRs.
 - (2) OAA (Field Walk-Downs). Results of field walk-downs conducted by NNSA/NSO SMEs, Program or Project Managers, FAMs, or Senior Management.
 - (3) OAA (Other). Routine oversight of contractor activity (NOT field walk-downs) conducted by federal staff (attendance/participation in meetings, documents reviewed, etc.).

2. REQUIREMENTS—NNSA/NSO STAFF.

- a. Document key OAAs and any identified issues that result in PIMS.
- b. Utilize information gathered from attendance at meetings, briefings, facility walk-throughs, and various contractor/user sources to maintain operational awareness of assigned oversight functions.

3. RESPONSIBILITIES.

- a. Manager, NNSA/NSO. Ensures NNSA/NSO staff and management develop and maintain sufficient operational awareness for their assigned areas of responsibility.

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b. AMs.

- (1) Ensure staff properly document completed key OAA in PIMS.
- (2) Synthesize operational awareness perspective provided by staff to determine what information should be reported to senior management.
- (3) Monitor contractor resolution of issues and CAPs as needed.

c. NNSA/NSO Staff.

- (1) Conducts and document in PIMS, OAAs commensurate with assigned functions.
- (2) Gathers operational awareness perspective from various sources and determines what information should be communicated to the supervisor and other line personnel. Use such information to support contractor performance evaluation input.
- (3) Be familiar with the site and facility characteristics, operating procedures, facility authorization bases, operating organizational structure, and key process control personnel.
- (4) Be aware of major work in progress or that is in the planning and approval phase.
- (5) Walk-down facilities and operations, and observe work performance.

APPENDIX CMAS1. INTRODUCTION.

- a. Prior to the beginning of each fiscal year, contractors⁸ conduct a rigorous self-analysis of the health of an agreed upon set of functional areas, and document the results in a formal report. The most recent contractor reports are maintained on the PAG webpage (<http://nvhome/pag/default.aspx>). The list of functional areas is also maintained on the PAG webpage.
- b. AMs, ODs, and assigned staff review the current contractor functional area status reports. The information provided in these reports, combined with operational awareness gained by the federal staff through routine oversight activity and the results of completed formal assessments, allows the development of a risk informed AIP for the coming year. A structured risk ranking process is used to develop a semi-quantitative estimate of risk for each functional area. The NNSA/NSO Risk Ranking Procedure and associated tools are maintained for staff use on the PAG webpage (<http://nvhome/pag/default.aspx>)⁹.
- c. Each NNSA/NSO organizational element identifies assessment activity and type necessary to satisfy DOE, NNSA, or NNSA/NSO directive requirements for which they have functional responsibility. Functional responsibilities for all NNSA/NSO organizational elements are defined in NSO O 111.X. NNSA/NSO organizational elements monitor changes to directives to identify assessment requirement changes. Where directives do not specify a required assessment frequency, Functional Area Representatives determine the need for assessments based on use of the risk ranking process described above.
- d. Once approved by NNSA/NSO senior management, the oversight activities described in the AIP become the MAS for the coming year.

⁸ Only the M&O contractor has developed functional area health reports. Other NvE project contractors and laboratories are not required to complete this task.

⁹ The NNSA/NSO risk ranking procedure and tools were developed by a team of representatives from each NvE organization. The present tool is based on a similar tool developed by the NNSA Y-12 Site Office and customized for NvE use.

- e. The NNSA/NSO MAS also includes assessments planned by external independent organizations of NNSA/NSO, NNSA/NSO contractors and Nevada National Security Site users.
- f. The primary purpose of including external IAs in the NNSA/NSO MAS is to ensure that the impact on NNSA/NSO resources from the external assessment is considered in the planning of other NNSA/NSO assessments. External IAs are included in the initial development of the MAS each year to the extent information is available.
- g. The scope of the NNSA/NSO MAS includes:
 - (1) NNSA/NSO oversight assessments.
 - (2) Planned shadow assessments.
 - (3) Internal IAs.
 - (4) Management assessments.
 - (5) External IAs of NNSA/NSO and contractor/user.
 - (6) Effectiveness reviews.
 - (7) ORRs/RAs.
 - (8) Assessments conducted jointly by NNSA/NSO and one or more contractors.

2. REQUIREMENTS.

- a. Develop a fiscal year AIP by October 1 of each year based on feedback and analysis. The AIP will include all assessments planned for execution during the fiscal year. The AIP will address the following topics, to the extent known, and identify any needed/required assessments or operational awareness focus areas:
 - (1) Emerging issues.
 - (2) NNSA/NSO performance areas.
 - (3) Contractor/user functional area performance areas.

b. MAS Annual Update.

- (1) Identify the NNSA/NSO formal assessments (including Shadow Assessments—see Appendix D) planned for the fiscal year, listed by quarter and functional area in response to the annual data call. Minimum information includes:
 - (a) Assessment title/topic.
 - (b) Responsible organizational element (AMSS, AM for Environmental Management [AMEM], Nuclear Safety Team [NST], etc.).
 - (c) Lead Assessor.
 - (d) Planned start date.
 - (e) Planned completion date.
 - (f) Type of assessment activity planned (oversight assessment, jointly conducted assessment, independent external assessment, etc.).
- (2) Avoid undue impacts on the assessed organization through coordination of schedules.
- (3) Coordinate with the affected contractor to conduct joint assessments.

c. Change Control.

- (1) Unless specifically exempted, any additions, deletions, or changes of the MAS require prior approval.
- (2) The MAS Change Control Request form is the process used to submit proposed changes and obtain approval¹⁰. The Change Control Form, with directions for its use, is available at <http://nvhome/pag/default.aspx>.
- (3) Configuration management of the NNSA/NSO MAS is maintained by PAG. The most current version of the approved MAS is maintained in PIMS. PAG also provides for updates of the JAS and the completed assessments library on the PAG webpage when assessments scheduled on the MAS are completed.

¹⁰ Alternately, when this function becomes available in the PIMS, requests for schedule changes may be processed electronically through the PIMS process.

3. RESPONSIBILITIES.

- a. Manager, NNSA/NSO. Directs the planning and performance of management assessments or internal IAs based on performance data or external commitments.
- b. Deputy Manager, NNSA/NSO. Chairs the EC/MSSP.
- c. EC/MSSP.
 - (1) Continuously monitors NNSA/NSO and contractor performance to identify concerns or areas of weakness that may require formal assessment. This information is used to develop the annual AIPs.
 - (2) Reviews and approves the annual AIP based upon Functional Area Representative's evaluations of the M&O's functional area performance, and AM's evaluation of emerging issues and NNSA/NSO performance areas.
 - (3) Reviews and approves the annual consolidated MAS.
 - (4) Reviews and approves any subsequent changes proposed by NNSA/NSO organizational elements throughout the fiscal year, except as delegated to PAG. The EC/MSSP Chair has final decision authority and may override EC/MSSP decisions on MAS change control actions.
 - (5) Monitors MAS execution against established performance measures and provides feedback to the NNSA/NSO Manager.
- d. AMs.
 - (1) Continuously monitor the health and performance of assigned functional areas. Identifies concerns or areas of interest that may require formal assessments. Factor in this information when developing the annual AIP.
 - (2) Identify management assessments needed in response to directive requirements or organizational performance data.
 - (3) Provide organizational element input to the annual AIP/MAS data call.
 - (4) Manage MAS Change Control Requests submitted by staff in accordance with requirements.

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- (5) Coordinate assessment activities to minimize impact on project or operational schedules.
- (6) Monitor DOE, NNSA, and federal requirements and directives for assigned functional areas to identify any changes to required assessments.

e. PAG.

- (1) Issues a data call to each organizational element in July for input into the following year's AIP and MAS.
- (2) Consolidates the annual input into an AIP and MAS for review by the EC/MSSP.
- (3) Once approved by the Deputy Site Office Manager, populates the MAS assessments into the PIMS for tracking throughout the fiscal year by creating assessment assignments in the PIMS Assessment Module (ASM).
- (4) Receives from AMs; coordinates EC/MSSP review as required; processes and documents in PIMS the results of MAS Change Control Requests. Approves MAS Change Control Requests for changes to planned assessments that result from actions outside the control of NNSA/NSO (e.g., external assessment schedule changes, delays in project execution that affect readiness reviews, etc.).
- (5) Maintains the MAS configuration management current to reflect assessment activity completed throughout the year and the results of MAS Change Control Requests.
- (6) Proposes, develops, and provides quarterly performance reports to the EC/MSSP regarding the execution of the MAS and the results of completed assessments.

f. All NNSA/NSO Staff.

- (1) Continuously monitors contractor-developed CAS dashboard reports, annual functional area narrative reports, and/or the results of applicable assessment activity.
- (2) Combines this input with personal knowledge of assigned functional area(s), program/project, or crosscutting area health, as gained through

OAA, operating experience and lessons learned gained from all sources, and awareness of relative developing trends and issues from across the DOE and NNSA.

- (3) Provides support and input to the assigned FAMs and AMs for consolidation and consideration in developing the annual AIP and MAS.

g. FRs and SSORs.

- (1) Perform the responsibilities of all NNSA/NSO staff as described above.
- (2) In addition, continuously monitor assigned facilities and systems and provide similar and relative input to FAMs, program/project managers and line management for those facilities and systems.

h. FAMs.

- (1) Perform the responsibilities of NNSA/NSO staff as described above
- (2) In response to the annual data call for the planning year AIP and MAS, incorporate contractor and NNSA/NSO staff input and apply the risk-ranking tool to arrive at a risk ranking for each assigned functional area. This ranking serves as the basis for a risk informed oversight strategy for the coming year. This evaluation and the associated risk ranking is used by AMs and the EC/MSSP to develop the AIP and MAS for the coming year.

APPENDIX D

SHADOW ASSESSMENTS

1. INTRODUCTION.

- a. Shadowing contractor-performed assessments is one technique available to NNSA/NSO staff to perform federal oversight of contractor activities. The results of shadowed assessments provide valuable information that contributes to a complete and balanced level of awareness of the effectiveness of a contractor's functional area, work activity, managed facility, or safety system's performance. In addition, they provide insight as to the effectiveness of the contractor's self-evaluation processes.
- b. Shadow assessments are characterized by a structured and documented review of the observed contractor's assessment practices and effectiveness for the assigned area of focus. Shadow assessments do not utilize the level of formal planning and reporting required for a full federal assessment, but do include more rigorous documentation expectations than routine OAs.
- c. Shadow assessments may be included in the AIP and scheduled on the MAS during the planning phase, or may be performed ad-hoc during a window of opportunity identified during the execution phase of the MAS.
- d. At the discretion of the EC/MSSP, shadow assessments (or jointly conducted assessments) may be utilized to fulfill all or some NNSA/NSO responsibilities for periodic assessments of functional areas as required by DOE directives.
- e. Completed shadow assessments are documented in the PIMS ASRP module by the Lead Assessor. The documentation package includes a Shadow Assessment Review Grading Sheet¹¹ and numerical score.
- f. Completed shadow assessment ASRP records are reviewed by PAG to verify the requirements of this appendix are met. AMs retain the final authority to approve shadow assessment ASRP records, but may delegate management of the PIMS workflow process to PAG. As applicable, feedback is provided to the

¹¹ Adapted from The Nuclear Exchange Operational Effectiveness report, "Self-Evaluation at H. B. Robinson, Catawba, Sequoyah, and Calvert Cliffs," NX-1035, dated August 2001. The criteria used for this evaluation was originally developed by Sequoyah Nuclear Plant and modified by the author for NNSA/NSO use.

Lead Assessor and his/her AM. S&S shadow activity is reviewed and approved by AMSS.

2. REQUIREMENTS—LEAD ASSESSOR.

- a. Reviews the JAS¹² to identify contractor planned assessment activities that may be candidates for shadowing.
- b. Identifies the assigned contractor lead for an assessment selected for shadowing, advise them of your intent to shadow their assessment, and coordinate with them to complete the shadow activity
- c. Observes the assessment process and results (the final report).
- d. Completes a Shadow Assessment Review Grading Sheet (available at <http://nvhome/pag/default.aspx>) provides a numerical score, and documents the results of your activity in the PIMS ASRP module. Attaches the completed grading sheet to the ASRP record. Alternately, the grading sheet may be incorporated directly into the record.

3. RESPONSIBILITIES.

- a. AMs.
 - (1) Ensure shadow assessment opportunities are considered and (as applicable) identified during the annual AIP and MAS planning process.
 - (2) Monitor staff oversight activity to ensure a balanced oversight strategy is maintained for areas of assigned responsibility. A balanced strategy may include federal assessments, shadow assessments, and OAA. Functional areas with a higher risk ranking value should rely more heavily on formal assessments, while lower risk areas may utilize more shadow assessments and OAA.
 - (3) If assigned on the approved MAS, ensure staff complete shadow assignments per this manual and document the results in the PIMS ASRP module.

¹² The JAS may be viewed at the M&O contractor Performance Assurance and Improvement Division webpage: <https://ntsweb.nv.doe.gov/ca/Assessments.shtm>.

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- (4) Through participation in the EC/MSSP, approve the use of identified shadow assessments in the annual NNSA/NSO oversight strategy as described in the AIP and MAS.
 - (5) AMSS or Delegated Staff.
 - (a) Reviews and approves in PIMS completed shadow ASRPs for S&S topics.
 - (b) Identifies OFIs and provides applicable feedback to Lead Assessors and NNSA/NSO management.
- b. Lead Assessor (for Shadow Assessments).
- (1) Do not interfere with the contractor's assessment process.
 - (a) Avoid participating directly in the assessment process. This is a contractor assessment and the contractor is responsible for its execution. You are not a member of the assessment team.
 - (b) Should you observe an issue that the assessment team does not and that you believe is significant, advise the team leader after the assessment is completed and document the issue in your report.
 - (2) As applicable, observe the team as it investigates each of the three primary legs of an assessment: people (interviews), paper (plans/procedures), and processes (work in progress). This practice is not required or feasible for every assessment shadowed, but it is optimal and should be the goal when possible. This may require observing team meetings, management briefings, interviews of personnel, reading a sample of documentation the assessment team reviews, or any other part of the assessment.
 - (3) Consider carefully the adequacy of the contractor's assessor or assessment team. Validate the team is adequately qualified, sufficiently prepared, follows through on potential issues to a reasonable conclusion, adheres to approved policies and procedures for conducting assessments, uses objective criteria to evaluate the area under review, properly documents the assessment process and results, and that any issues identified are managed in accordance with company procedure.
 - (4) In cases where multiple NNSA/NSO staff may need to shadow the same assessment, coordinate shadowing activity carefully with the contractor's

lead assessor. Except in rare cases, there should only be one shadow observer of an assessment activity at any one time. In situations when it is necessary to engage more than one shadowing personnel for a specific assessment (for example, multiple personnel may need to observe a work activity that is conducted specifically for the assessment team to observe), those shadowing the assessment team must take special care to avoid interfering with the contractor's assessment team process.

APPENDIX EASSESSMENT PLANNING, EXECUTION, AND REPORTING1. INTRODUCTION.

- a. Formal Assessments. Identified in the AIP and MAS are systematically and formally planned¹³, executed, and reported.
- b. Assessing for Compliance and Performance¹⁴.
 - (1) There are two different methods commonly used for accomplishing assessments. These are usually known as compliance assessment and performance-based assessment. While each method has distinct characteristics, a good assessment will usually gauge, at some level, effectiveness of the processes, systems, and programs in meeting the mission and objectives of the organization. In practice, an assessment is likely to include both compliance and performance-based methods.
 - (2) Compliance Assessments.
 - (a) Compliance assessments focus on verifying compliance with requirements through the implementation of procedures, and begin with a determination of the contractual and regulatory requirements governing the assessed organization. Assessors should become familiar with requirements and procedures and then verify that requirements flow down to implementing documents such as procedures, whose implementation is in turn verified.
 - (b) Assessing for compliance alone may not adequately identify higher-level systemic or programmatic problems or determine the effectiveness of the program. For example, an organization may have written procedures that appear to implement the requirements;

¹³ **NOTE:** PIMS uses the term “assessments” to include formal, planned assessments as well as all types of operational awareness activity and shadow assessments. A formally approved plan is not required for all these types of assessment activities, though one may be developed for these activities as well at the discretion of the Lead Assessor or as stipulated by the affected AM. For informal assessments a Lead Assessor may rely on checklists, personal experience, or any other tools to guide and direct the oversight activity.

¹⁴ DOE G 414.1-1, Section 3.7.

however, in practice the intent of those requirements may not be fully achieved because of variables such as poorly executed procedures.

(3) Performance-Based Assessments.

- (a) Performance-based assessments take a different approach by focusing first on the adequacy of the process that produced a product or service, and then on the product itself. If problems are found in the product or work processes, the assessor evaluates the methods and procedures used to implement the applicable requirements in an effort to find the failure that led to the problems. The assessor is expected to determine whether a noncompliance or series of noncompliances with procedures could result in a failure to satisfy top-level requirements. Results of prior compliance assessments may help the assessor in determining the focus areas for planning performance-based assessments.
- (b) In performance-based assessments, great emphasis is placed on getting the full story on a problem before coming to a conclusion. If an assessor sees a problem with the execution of a welding process, the next step should determine the extent of the problem. Is it limited to one welder? Is it limited to one process? Can the problem be traced to the qualification program for the welder or to the qualification program for the welding process? Is there a problem with the weld material itself, indicating a problem such as engineering or procurement?
- (c) While the assessor should be familiar with requirements and procedures, in performance-based assessments the assessor's experience and knowledge play an integral part in determining whether requirements are satisfied. Therefore, participants in performance-based assessments should be technically competent in the areas they are assessing. For example, if an assessor is evaluating a welding process, the assessor relies heavily on his or her knowledge of welding codes, welding processes, and metallurgy, rather than just verifying simple procedure.
- (d) Performance-based assessments usually provide the most useful information to management; however, it requires a much higher level of competence on the part of the assessment team. Results of performance-based assessments may provide useful insight for management's pursuit of excellence.

2. REQUIREMENTS.

a. Assessment Planning.

(1) Preparation for Conducting an Assessment.

- (a) Research past performance, past assessment results, CAS data, lessons learned, issues identified in applicable issues tracking systems (CaWeb, PIMS, Deficiency Tracking System, or equivalent), occurrence reports, and other sources of information that would assist in planning an effective assessment using a risk informed approach.
- (b) Research and compile performance documents for review during the assessment (i.e.; procedures, requirements, and applicable records).
- (c) As a part of contractor/user oversight assessments, examine the contractor's/user's self-assessments with regard to:
 - 1 Assessment methods (e.g., whether sufficient emphasis is placed on observation of work activities).
 - 2 Frequency, breadth, and depth.
 - 3 Line management involvement.
 - 4 Assessor's technical expertise and qualification.
 - 5 Degree of rigor applied.
- (d) Sources of relative information for assessment planning and research may include (but are not limited to):
 - 1 The PAG webpage (<http://nvhome/pag/default.aspx>) contains an on-line library of completed federal formal assessments arranged by year and topic.
 - 2 The PAG webpage also includes links to relative contractor information, such as completed ASRPs, dashboards, and lessons learned information.

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- (2) Develop an Assessment Plan. Assessment plans are developed for formal assessments scheduled on the MAS¹⁵; or as needed per the discretion of the Lead Assessor and/or direction of the applicable AM¹⁶ after consideration of the scope, level of significance, and potential visibility of the assessment. Assessment plans adhere to the following requirements for content. Assessment plans are documented in the PIMS ASM record.
- (a) Minimum Content of Assessment Plans.
- 1 Name/title of the assessment.
 - 2 The PIMS ASM record number.
 - For example, ASM-AMxx-9/11/2010-xxxxx. An ASM record number is automatically created by PIMS when the record is first saved. For formal assessments scheduled on the approved MAS, PAG creates ASM records and makes Lead Assessor assignments per the direction of the EC/MSSP. For all other formal assessments, the Lead Assessor is responsible to create the ASM record.
 - 3 The assigned Lead Assessor and any other team members.
 - 4 The NNSA/NSO organizational element responsible to perform the assessment (e.g., AMSO, AMEM, NST, Office of Public Affairs, etc.).
 - 5 The type of assessment.
 - 6 A record of assessment plan approval and the date of approval by the responsible AM.
 - 7 The location, facility, and contractor being assessed.
 - 8 The planned start and finish dates.
 - 9 The functional area being assessed.
 - 10 The subject and scope of the assessment.

¹⁵ Except for planned shadow assessments scheduled on the MAS.

¹⁶ The AM of the NNSA/NSO organization conducting the assessment.

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- 11 A brief synopsis of the review process that will be used in conducting the assessment (i.e., document review, interviews, field observations).
 - 12 The name, education, professional credentials/certifications, and synopsis of relevant experience of the assessment team.
 - 13 Criteria and Review Approach Document (CRAD) (or equivalent if approved by the responsible AM).
 - Blank CRAD forms and previously developed CRADs are available on the PAG webpage (<http://nvhome.nv.doe.gov/pag/default.aspx>). Each CRAD will include the objective, criteria, requirements, and review approach including documents to be reviewed, personnel to be interviewed, and operations to be observed.
- (b) Coordinate development of assessment plans with appropriate NNSA/NSO line management staff program/projects managers and the organization to be assessed.
 - (c) Electronically transmit (email) assessment plans to the organization to be assessed and the affected NNSA/NSO line organization (AMEM or AM for National Security). Assessment plans may also be transmitted using a formal transmittal letter at the discretion of the Lead Assessor or at the direction of the applicable AM.
 - (d) Secure any needed resources through the AMs or NNSA/SC.
- (3) Conducting an Assessment.
- (a) Perform formal assessments in accordance with approved assessment plans. Conduct informal assessments using the discretion of the Lead Assessor and standard assessment techniques.
 - (b) General techniques for conducting any assessment include:
 - 1 Ensure any potential findings are clearly correlated with a specific requirement. If a requirement cannot be clearly correlated and cited, then the issue is not a finding. Such an issue may be considered as an OFI, or simply not included in the final report.
NOTE: A Lead Assessor or assessment team may occasionally find a condition that cannot be linked to a clear requirement, but

nonetheless may indicate serious performance issues. In such cases, when a clear requirement cannot be identified, it is incumbent on the Lead Assessor to ensure the condition is adequately described and documented in the ASRP and raised to senior management for information and possible action.

- 2 When observed, credit the assessed organizations by identifying any NPs noted during the assessment. However, ensure such practices so identified exceed the normal expectation for performance and bear special recognition for consideration across the NvE or NNSA complex.
- 3 The conduct of the assessment team includes interfacing with the assessed organizations' staff during interviews, the use and selection of guides, the importance of objective evidence, sampling techniques, making notes and communicating deficiencies, among other activities. As the Lead Assessor is responsible for the assessment, he or she needs to control the behavior of the assessment team members. Usually the Lead Assessor can rely on the professionalism of the team but when new or inexperienced members are assigned the Lead Assessor might need to spend a little time with the new member to become familiar with their style. Many assessors do things they are not aware of such as act impatient, give opinions, or use the wording of the standard too much. The Lead Assessor can provide feedback in this situation.¹⁷
- 4 When conducting interviews, it is important to be able to communicate with interviewees successfully. Different people use different language and have different levels of understanding. A good assessor will address his or her questioning style and approach depending on the person they are interviewing. Also be wary of the tone of your voice and your body language. Adopt open and communicative tones and poses. Use open-ended questions (those that cannot be answered with a "yes" or "no.") Avoid using jargon or acronyms unless you are confident the terms used are well understood by the interviewee.¹⁸

¹⁷ Adapted from "ISO-9001:2008 Lead Auditor Training Course Manual," IRCA accredited course 17083, Cavendish Scott, Inc., Denver, CO 80209.

¹⁸ Ibid.

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- 5 Attempt to investigate each of the three legs of an assessment: people (interviews), paper (plans/procedures), and processes (work in progress). This practice is neither required nor feasible for every assessment, but it is optimal and should be the goal whenever possible.
 - 6 Objective Evidence. Facts that can be proved, demonstrated, and/or shown to be true is extremely important in any assessment. To be able to demonstrate conformance to a requirement, objective evidence in the form of records or activities must be evaluated. Whenever you think there is a finding, be absolutely certain about the objective evidence that is available and recorded to support the finding. Objective evidence needs to be precise. Specific document numbers, locations, etc. need to be identified in order to establish objective evidence.¹⁹
 - 7 When observing work activity in the field, assessors should avoid interrupting operators at their work. The assessor should wait for opportune times to interact with operators accomplishing work. Perform observations unobtrusively. Operators carry the true burden of safety, and a diversion from their duties could adversely affect plant operations.^{20 21}
 - 8 Identify findings, OFIs, or NPs using the definitions in this directive.
 - 9 Entrance, in process, and exit briefings are discretionary and should be coordinated by the Lead Assessor or designee with the assessed organization(s) and the AM with programmatic responsibility.
- (4) Documenting Formal Assessments in an ASRP.
- (a) ASRPs are developed for all oversight activities, including formal assessments and OAAs. The content of ASRPs varies with the scope and breadth of the assessment. For example, informal assessments such as an OAA (walk-through) conducted by a SME, FAM, or line manager, though documented as an ASRP within PIMS and assigned an ASRP record number, nonetheless does not require the scope or

¹⁹ Ibid.

²⁰ Adapted from DOE-STD-1063-2006.

²¹ For additional information regarding assessment practices and techniques, the interested reader may refer to DOE G 414.1-1.

extent of reporting documentation associated with a formal assessment or a readiness review. AMs and Lead Assessors are afforded considerable latitude and expected to exercise judgment as to the depth and breadth of reporting that is appropriate for informal assessments.

- (b) Content of Formal ASRPs. For formal assessments, NNSA/NSO stipulates the minimum content and format for ASRPs:
- 1 Name/title of the report.
 - 2 ASRP number assigned by PIMS.
 - 3 Name of the Lead Assessor and any other team members.
 - 4 A record and date of approval by the Lead Assessor, all team members, and the responsible AM.
 - 5 As needed, a list defining acronyms used within the report.
 - 6 An executive summary containing a brief synopsis of the results of the report, a listing of any issues identified, and any systemic or programmatic issues or concerns.
 - 7 As applicable, any DPOs raised by any assessment team member. The team member(s) with the DPO is responsible to document their position using the guidance of NSO O 442.X and provide it to the team leader to be included in the ASRP record.
 - 8 Completed CRAD (or equivalent if approved by the responsible AM).
 - a CRAD forms are available on the PAG webpage (<http://nvhome.nv.doe.gov/pag/default.aspx>).
 - b Identify any activities observed, interviews conducted, documents reviewed, the results for each criterion assessed, any identified issues, and provide a conclusion. The conclusion presents a synopsis of the results derived from the CRAD. In particular, this section should describe the underlying facts or basis for any findings, OFIs, or NPs. This section should also provide a brief explanation as to why the review objective was considered met or not met.

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- (c) Analyze the assessment results for potential systemic issues. Systemic or programmatic issues should be discussed in the Executive Summary.

b. Factual Accuracy Review.

- (1) Factual Accuracy Reviews are coordinated with the assessed organization and affected NNSA/NSO organizational elements. The allotted timeframe for this review should be commensurate with the assessment scope and complexity, and consider such factors as normal work schedules and the ongoing workload/priorities within the organization assessed. Consult with the supervisor and the affected NNSA/NSO line manager before terminating a factual accuracy review because of “no input.”
- (2) Prior to approval of the final ASRP, any DPO and recommendations are resolved by responsible managers (AMs) in accordance with the functional responsibility assignments identified in NSO O 111.X. Resolution may include rejection of the recommendation, acceptance of the recommendation, or an alternative action. If the responsible manager is unable to resolve the disagreement(s), the EC/MSSP or the NNSA/NSO Manager will resolve them prior to approval of the final ASRP.

3. RESPONSIBILITIES.

a. Manager, NNSA/NSO.

- (1) Resolve DPOs, factual accuracy issues, and final issues in situations where the EC/MSSP are unable to reach agreement.
- (2) Approves Effectiveness Reviews.

b. EC/MSSP.

- (1) Approves the annual AIP and MAS and oversees its progress during the execution year.
- (2) Evaluates and approves findings from NNSA/NSO-conducted assessment activity. Consider DPOs and recommendations raised by NNSA/NSO staff.

NOTE: ASRPs are approved in advance of final review and approval of NNSA/NSO-identified findings (see Appendix G for further details). Thus, the final contents of the finding in the ASRP may be different from the contents of the finding in PIMS. This is an expected potential variance

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that is generally addressed through entry of explanatory comments in PIMS as needed.

c. AMs.

- (1) Provide resources to support assessments. Ensure that Lead Assessors and team members dedicate the necessary time to the assessment activity. Collateral duties are reduced or eliminated in order to keep the assessments on schedule.
- (2) Coordinate assessment activities to minimize impact or disruption to project or operational schedules.
- (3) Ensure assessments are planned, completed, and documented in accordance with the approved MAS.
- (4) Approve assessment plans and reports for formal assessments. AMs approve final ASRPs prior to presentation of the issues to the EC. At their discretion, AM/ODs may elect to delegate approval authority to designated staff.
- (5) Resolve DPOs or factual accuracy issues prior to issuance of the final report, or elevate to the NNSA/NSO Manager for resolution if necessary.

d. Lead Assessor.

- (1) Develop assessment plans and reports in PIMS for formal assessments.
- (2) Conduct the assessment, manage NNSA/NSO resources allocated for execution of the assessment, and ensure assessments are completed in accordance with the approved MAS.
- (3) Serve as the interface between NNSA/NSO and the assessed organizations' management during the conduct of the assessment.
- (4) As needed or as requested by senior contractor or federal managers, provide entrance, in process, and exit briefings to organizations being assessed.
- (5) Provide recommendations for resolution of any DPOs to the responsible manager.

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- (6) Responsible to maintain the PIMS records associated with the assessment. Periodically review, update, and monitor the status of the PIMS ASM record (and all sub-tier PIMS records as applicable) until the assessment is completed and the final ASRP record is closed. This includes initiating change control requests as needed, documenting the results of the change control request, and revising affected PIMS records accordingly.
- (7) As needed to provide a full record of the assessment, upload supporting documentation and completed reports into the applicable PIMS records.

NOTE: “Completed reports” means a final document with an approval signature. (For example, unsigned WORD documents or draft reports are not sufficient records to demonstrate completion of the assessment). PIMS ASM records will not be closed until the necessary documentation is attached. PIMS record access controls shall be used when uploading Official Use Only or Unclassified Control Nuclear Information documents.

e. Assessment Team Members.

- (1) Perform assessments under the direction of the Lead Assessor per the approved assessment plan.
- (2) Inform the Lead Assessor of any issues that emerge during the conduct of the assessment (unavailability of contractor/user personnel for scheduled interviews, unavailability of requested documents, etc.).
- (3) Assist the Lead Assessor in developing assessment plans, performing the assessment; and documenting assessment results. Provide additional input to the ASRP as requested by the Lead Assessor. Resolve factual accuracy comments and assist in briefings as requested by the Lead Assessor.
- (4) Document DPOs and recommendations for resolution, as warranted.

APPENDIX F

CAPs

1. INTRODUCTION. CAPs are developed for assessment findings to ensure they are appropriately resolved. Four types of CAPs require different processing:
 - a. NNSA/NSO develops CAPs for Priority 1 and Priority 2 findings identified during management assessments. The NNSA/NSO Manager assigns an NNSA/NSO CAP Lead to develop CAPs. The NNSA/NSO Manager either retains or delegates final approval authority for a federally developed CAP.
 - b. Contractors develop CAPs for Priority 1 and Priority 2 findings identified during NNSA/NSO conducted oversight assessments. These CAPs are provided to NNSA/NSO for review and approval. The NNSA/NSO Manager assigns an NNSA/NSO CAP Lead to review these CAPs. The NNSA/NSO Manager either retains or delegates final approval authority for a contractor developed CAP.
 - c. For findings identified as a result of external assessments, the NNSA/NSO Manager assigns an NNSA/NSO CAP Lead responsibility to coordinate all actions required for Field Element Managers by DOE O 414.1, Attachment 4, "Corrective Action Management Program."
 - d. AMSS ensures CAPs are developed for all S&S-related assessment findings (both federal and contractor/user).
2. REQUIREMENTS.
 - a. All findings, regardless of source, are assigned a priority level (1-4).
 - b. CAPs are required for all findings designated as a Priority Level 1 or 2. CAPs are not required for Priority Level 3 or 4 findings, OFIs, or NPs. Actions to correct Priority Level 3 or 4 issues must be completed, but no formal CAP is required. However, NNSA/NSO senior management may opt to prepare, or require a CAP be prepared, for any issue regardless of priority level. An AM or above must approve any decision to require contractors to prepare a CAP for Priority Level 3 or lower issues.
 - c. CAPs developed for Priority Level 1 or 2 findings must include provisions to conduct and document Extent of Condition reviews and Causal Analyses.

Actions in the CAP are to be developed to address the results of these reviews and analyses.

- d. CAPs are required for all findings, regardless of priority level, which originate from external IAs. The level of detail of these CAPs should correspond to the assigned priority level; higher priority issues require a more detailed CAP. No CAPs are required for any OFIs or NPs.

3. RESPONSIBILITIES.

- a. Manager, NNSA/NSO. Assigns NNSA/NSO CAP Leads to coordinate the development, review, and approval of CAPs.
- b. AMs.
 - (1) Ensure organizational coordination with and responsiveness to an assigned CAP Lead.
 - (2) Approve requests to develop a CAP for Priority Level 3 or lower issues.
 - (3) Track assigned CAP corrective actions to completion.
- c. CAP Lead.
 - (1) Coordinates the development and approval of the CAP assigned.
 - (2) Ensures Extent of Condition reviews and Casual Analyses are conducted and documented as required.
 - (3) Reviews CAPs to ensure corrective actions are likely to fully address the identified deficiency, and ensures any NNSA/NSO organization with functional responsibility related to the corrective actions is included in the review process.
 - (4) Ensures corrective actions and completion dates are entered into PIMS Action records with a responsible party assigned.
 - (5) Provides coordination between affected entities (contractor or NNSA/NSO) as needed to resolve concerns with a CAP.
 - (6) Prepares formal approval correspondence to include concurrence of appropriate AMs.

APPENDIX G

ISSUES MANAGEMENT

1. **INTRODUCTION.** The NNSA/NSO Issues Tracking System is an NNSA developed application called the PIMS. Contractors may use the issues tracking system of their choice to manage issues and corrective actions.

2. **REQUIREMENTS.**
 - a. Issues originating from any internal or external source are managed in accordance with Attachment 1.

 - b. All findings generated by any NNSA/NSO oversight activity are screened by the NNSA/NSO Issues Screening Team (IST), prior to submittal to the EC/MSSP for final approval. The IST operates in accordance with a written charter approved by the NNSA/NSO Manager.

 - c. Lead Assessors, Responsible Party, and Assigned To (per PIMS) are assigned as follows:

	External IAs	NNSA/NSO Assessments (Management and Internal IAs)	NNSA/NSO Operational Awareness or Contractor/User Oversight Assessments
Lead Assessor	NNSA/NSO designated POC for coordinating with the external assessment team.	NNSA/NSO Team Leader for the assessment that identified the issue.	NNSA/NSO individual who identified the issue.
Responsible Party/Assigned To	NNSA/NSO employee assigned to resolve and close NNSA/NSO issues.	NNSA/NSO employee assigned to resolve and close NNSA/NSO issues.	Assigned by applicable contractor using the contractor's issue management system.

3. **RESPONSIBILITIES.**
 - a. **Manager, NNSA/NSO.**
 - (1) Resolves issues management conflicts that cannot be resolved at lower levels.

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- (2) Coordinates independent technical reviews of disputes involving significant contractor/user oversight findings.
 - (3) Accepts or rejects independent technical reviews of disputes involving significant contractor/user oversight findings.
- b. EC/MSSP.
- (1) Reviews and approves findings, and assigned priority levels, identified through NNSA/NSO oversight assessments, management assessments, independent internal assessments, and OAAs.
 - (2) Reviews OFIs and NPs identified through NNSA/NSO oversight assessments, management assessments, independent internal assessments, and OAAs.
 - (3) Receives and reviews quarterly tracking and trending reports, identifies any corrective actions needed, and assigns actions as required.
- c. JORRB.
- (1) With the EC/MSSP, screens all findings identified by external IAs.
 - (2) Reviews OFI and NP for consideration of possible further action(s). Contractors/users unilaterally identify any actions to take in response to OFI or NP. No response is required to OFI or NP.
- d. AMs.
- (1) Assigns staff as “Responsible Party” and/or “Assigned To” in PIMS to resolve federal issues.
 - (2) Resolves issues management conflicts with other AMs or contractors/users, as needed.
 - (3) Monitors progress on issue closure
 - (4) Ensures CAP Lead responsibilities are carried out as assigned.
 - (5) Assigns qualified staff to the NNSA/NSO IST.
- e. NNSA/NSO IST. Performs screening reviews of NNSA/NSO-generated issues, and recommends issues for presentation to the EC/MSSP.

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- f. Lead Assessor. Ensures approved issues are entered into PIMS, and any associated federal CAP is electronically attached to the record.

- g. Responsible Party (and/or Assigned To). The person identified within PIMS responsible to complete an action assignment. At the discretion of the Responsible Party, the Responsible Party and the Assigned To may or may not be the same person. If the Assigned To is another person other than the Responsible Party, the Assigned To completes the work for the benefit of the Responsible Party
 - (1) Enters corrective actions into the PIMS Action module (or ensures they are entered).
 - (2) Verifies corrective actions assigned in PIMS are consistent with the approved CAP.
 - (3) Conducts appropriate verifications of all actions associated with a finding prior to closing the finding in PIMS
 - (4) Completes actions and attaches closure documentation to the PIMS record. Requests approval of findings when all actions are completed.

APPENDIX H

PERFORMANCE MEASURES

1. INTRODUCTION.

- a. Performance measures are developed to gain insight into, and make judgments about the effectiveness of NNSA/NSO and contractor/user programs and processes. Performance measures address matters of timeliness, cost-effectiveness, compliance with standards, and effectiveness. Best-in-class organizations define strategic goals and objectives, develop performance measures to monitor progress towards success, gather and analyze performance data, and then use this data to drive improvements.
- b. The NNSA/NSO Integrated Safety Management (ISM) System requires NNSA/NSO to develop and communicate to the M&O contractor safety objectives, measures, and commitments. These may be promulgated through the contract Performance Evaluation Plan. NNSA/NSO establishes other performance metrics to monitor performance in key areas defined by NNSA Headquarters (HQ). NNSA/HQ has recently defined several “performance categories” for which NNSA Site Offices are required to develop and report performance measures. Only one performance category is related to federal reporting, the others are contractor-reporting requirements. The performance category NNSA Site Offices are required to report is entitled, “Line Oversight.” NNSA/HQ provided several examples of “Focus Areas.”
 - (1) Redirection of oversight resources based on performance and risk.
 - (2) LO systematically evaluated and improved.
 - (3) Training and qualification.
 - (4) Formal assessment.
 - (5) Operational awareness.
 - (6) Performance Evaluation Plans.

2. REQUIREMENTS.

- a. Develop NNSA/NSO performance measure(s) that measure progress towards the NNSA/HQ performance category: “Line Oversight.”

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- b. Assign Performance Measurement Leads and supporting NNSA/NSO SMEs to gather, analyze (e.g., Pareto analysis and identification of any trends), and report data.
 - c. Provide periodic input to the NNSA/HQ Performance Measurement System through the NNSA/NSO M&O contractor.
3. RESPONSIBILITIES.
- a. Manager, NNSA/NSO.
 - (1) Defines the strategic objectives to drive success and improvement. These objectives are influenced as a result of feedback analysis performed at lower levels in the organization.
 - (2) Holds M&O contractors and their parent entities accountable for performance
 - b. EC/MSSP.
 - (1) Reviews and approves proposed performance measures.
 - (2) Selects Performance Measurement Leads and approves focus group members.
 - c. AMs.
 - (1) Propose performance measures for consideration by the EC/MSSP.
 - (2) Ensure assigned focus group participants provide effective support to Performance Measurement Leads.
 - (3) Periodically assess the effectiveness and direction of the organization's contribution to the measurement program in meeting goals and objectives.
 - d. PAG. Ensures performance measure input is provided by the M&O contractor into the NNSA/HQ Performance Measurement System.
 - e. Performance Measurement Leads. Lead a designated focus group to gather, analyze (Pareto Analysis and identification of any trends), and report performance measurement data.

APPENDIX I

FEEDBACK AND IMPROVEMENT

1. INTRODUCTION.

- a. Feedback and improvement is a fundamental aspect of quality; it applies to all functional areas. NNSA/NSO has instituted a unified system of feedback mechanisms so that feedback information is obtained where necessary and acted upon appropriately. DOE O 414.1 requires that Site Offices “Identify the causes of problems, and include prevention of recurrence as a part of corrective action planning.” (Quality Assurance Criterion 3). Sources of feedback information include, but not limited to:
 - (1) Emerging issues.
 - (2) Operating experience reports.
 - (3) Lessons learned.
 - (4) Occurrence reports.
 - (5) Incidents of security concerns.
 - (6) Accident investigations.
 - (7) ASRPs.
 - (8) Security appraisals, surveys, and observations.
 - (9) Operational awareness.
 - (10) Contract performance evaluations.
 - (11) CAS information.
- b. Problems are tracked, feedback information is analyzed, and trends of identified problems and associated causes may be identified. This information drives actions to preclude escalating problems, prevents problem recurrence, and drives process improvement.

2. REQUIREMENTS.

- a. Integrate and analyze feedback information to identify needed NNSA/NSO improvements.
- b. Integrate and analyze feedback information to identify any contractor/user management and/or technical issues in need of improvement.
- c. Reprioritize NNSA/NSO operational awareness and assessment focus and revise performance measures as needed in response to emerging issues or feedback analysis.
- d. Communicate analysis of feedback input and improvement initiatives throughout NNSA/NSO.

3. RESPONSIBILITIES.

- a. Manager, NNSA/NSO. Approves EC/MSSP feedback analyses and determines future improvement initiatives.
- b. EC/MSSP.
 - (1) Identifies DOE, NNSA, and NNSA/NSO emergent issues and solicits emergent issues from the ISM Council.
 - (2) Regularly reviews feedback information to maintain awareness of Site Office performance.
 - (3) Periodically analyzes feedback information to:
 - (a) Identifies needed management or internal IAs of NNSA/NSO.
 - (b) Identifies functional areas that need increased senior management attention.
 - (c) Reprioritizes management, internal IAs, or contractor/user oversight assessments in light of emerging issues or adverse performance trends.
 - (d) Identifies needed improvement initiatives and makes assignments.
 - (e) Utilizes contractor feedback information analysis to support contractor performance evaluations.

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- (4) Briefs the NNSA/NSO Manager on analysis results for discussion and appropriate subsequent actions.
 - (5) Documents EC/MSSP feedback analysis, actions, and improvement initiatives.
 - (6) Communicates analysis of feedback input and improvement initiatives throughout NNSA/NSO via the intranet, staff meetings, All Hands Meetings, Program Reviews, etc.
 - (7) Approves lessons learned that will be submitted to the DOE/HQ-maintained Lessons Learned Database.
- c. AMs.
- (1) Assign staff leads to acquire defined feedback information.
 - (2) Analyze feedback information within their functional assignments to:
 - (a) Identify needed Management assessments of their organization.
 - (b) Recommend functional areas that need increased senior management attention.
 - (c) Request reprioritization of internal IAs or contractor/user Oversight Assessments in light of emerging issues or adverse performance trends (see Appendix C).
 - (d) Identify needed organizational improvement initiatives and make assignments.
 - (3) Utilize contractor feedback information analysis to support contractor performance evaluations.
- d. Staff Representatives. Review and analyze acquired operational awareness and assessment results to recommend future priority assessment needs or identify major trends requiring corrective actions.
- e. Corporate Operating Experience Program Manager. Forwards lessons learned that would be submitted to the DOE/HQ-maintained Lessons Learned Database to the EC/MSSP for review as part of feedback and improvement.

APPENDIX J

RECORDS

1. REQUIREMENTS.

- a. The following types of documents constitute records of NNSA/NSO assessment and oversight activity:
 - (1) Approved NNSA/NSO AIPs and MASs.
 - (2) Completed and approved assessment plans and ASRPs (including shadow ASRPs).
 - (3) NNSA/NSO and affected contractor correspondence and/or applicable emails pertaining to assessment activity and results (i.e., CAPs and status, requests for approval, approvals or denials of requests, technical direction or guidance, concerns, etc.).
 - (4) NNSA/NSO assessor documentation of review and acceptance of contractor/user completion of corrective actions. This includes validation closure forms.
- b. Original copies of the documents listed above are retained and archived using the established NNSA/NSO file code system and in accordance with NNSA/NSO record retention requirements.
- c. A number of electronic data systems are used in meeting the requirements of this directive. However, none are certified as an electronic record keeping system. Hence, paper copies, printouts, etc., are required to be maintained separately in addition to the electronic media. This includes electronic data entries into: (1) the NNSA/NSO Issues Tracking System (PIMS); (2) the monthly database for M&O contractor performance evaluation; and (3) the NNSA HQ LOCAS database of contractor and site office performance measures.

2. RESPONSIBILITIES.

- a. AMs. Ensure personnel enter records supporting assessment and oversight activity into PIMS.

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- b. Staff Representatives. Enter or attach records supporting assessment activity into PIMS. Information may be entered directly into PIMS record fields, or attached to the PIMS record.
- c. PAG. Provides for periodic transfers of PIMS electronic records that document NNSA/NSO assessment and oversight activity to NNSA/NSO Central Files.

ISSUES MANAGEMENT PROCESS

The following process will be utilized when managing issues resulting from Operational Awareness Activities (OAA) and assessments. These instructions apply to any federal issue to be tracked in enterprise Pegasus Information Management System (PIMS). Issues assigned to contractors for resolution are transmitted to the affected contractor once approved by the National Nuclear Security Administration Nevada Site Office (NNSA/NSO) Executive Council (EC)/Management System Steering Panel (MSSP) and become the responsibility of contractors/users to manage in accordance with Issues Management Systems.

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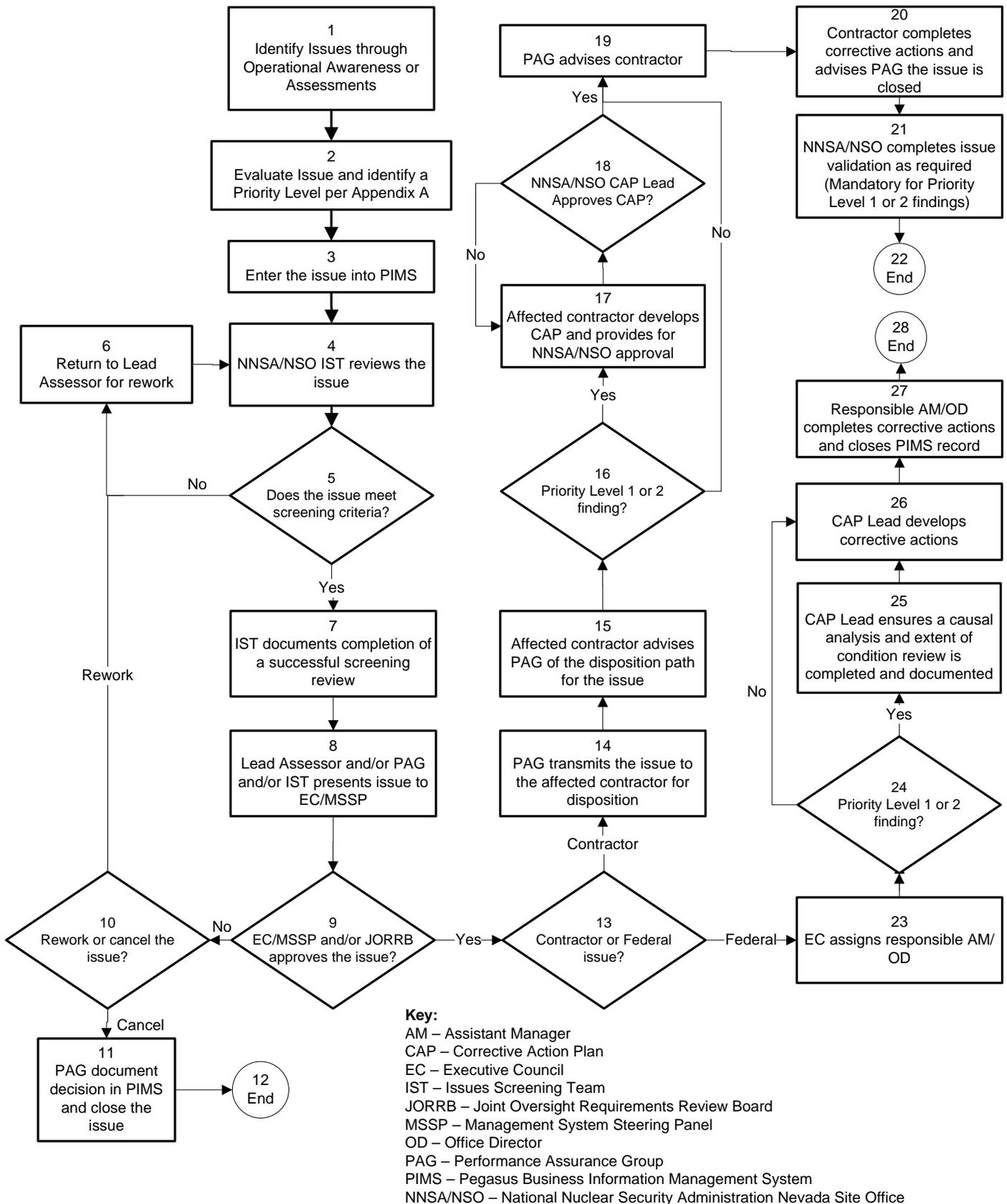


Figure 6—Issues Management Process Flow Diagram

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Box 1. Identify Issues through OAA or assessments.

Box 2. The Lead Assessor evaluates each issue and identifies a priority level per Appendix A.

Box 3. The Lead Assessor creates and opens an issue record within PIMS. The Lead Assessor provides, in the Comments field of the Issues record, the specific criteria used to justify the priority level selected.

Box 4. The NNSA/NSO Issues Screening Team (IST) reviews the issue against established screening criteria.

Box 5. The IST completes its review of the issue. The IST either accepts the issue as written or rejects it and returns the issue to the Lead Assessor for rework.

Box 6. As necessary, the Lead Assessor re-works the issue to address the IST comments and resubmits to the IST for review.

Box 7. The IST documents (in the PIMS record) that the issue has been successfully screened and prepares the issue for presentation to the EC/MSSP and/or Joint Oversight Requirements Review Board (JORRB).

Box 8. The issue is presented to the EC/MSSP and/or the JORRB for review and approval

Boxes 9 and 10. The NNSA/NSO EC/MSSP and/or JORRB accepts the issue as written, returns the issue for rework, or cancels the issue.

Box 11. If the EC and/or JORRB choose to cancel an issue, the Performance Assurance Group (PAG) documents that decision in PIMS.

Box 12. For cancelled issues, PAG closes the issue record in PIMS and the process ends.

Box 13. Issue processing is routed to different paths for federal or contractor issues

Box 14. (Contractor Issue) Once approved by the EC/MSSP and/or JORRB, PAG transmits issues to the affected contractor(s) for disposition.

Box 15. (Contractor Issue) The affected contractor advises NNSA/NSO (through PAG) of the action to be taken for each issue (accepted and assigned a tracking number for

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further action, declined, or accepted with no further action planned). **NOTE:** Contractors are not required to act upon Opportunities for Improvement or Noteworthy Practices generated through federal oversight activity unless directed otherwise by NNSA/NSO senior management.

Boxes 16 through 18. (Contractor Issue) For Priority Level 1 or 2 issues, affected contractors are required to develop and obtain NNSA/NSO approval of Corrective Action Plans (CAP). CAPs are approved by the CAP lead assigned by the Site Office Manager and PAG is advised.

Box 19. (Contractor Issue) Once CAPs are approved by the EC/MSSP, PAG advises the affected contractors.

Box 20. (Contractor Issue) Affected contractors execute corrective actions and/or CAPs, close issue when actions are completed, and advise PAG when actions are completed.

Box 21. (Contractor Issue) PAG advises the responsible Point of Contact (POC) for each issue that corrective actions have been completed. POCs complete and document finding validations at their discretion (*except for Priority Level 1 or 2 findings. A documented validation is required for these findings. Finding validation forms are available on the PAG webpage <http://nvhome/pag/default.aspx>*). The Responsible POC closes the issue in PIMS when satisfied with the corrective actions taken.

Box 22. End.

Box 23. (Federal Issue) Responsible Assistant Manager (AM)/Office Director (OD) and/or CAP Lead (as applicable) is identified and assigned within PIMS.

Box 24. (Federal Issue) Priority Level 1 or 2 findings require a causal analysis and extent of condition review be completed.

Box 25. (Federal Issue) CAP Lead provides for a causal analysis and extent of condition review (as required).

Box 26. (Federal Issue) CAP Lead develops corrective actions and enters them into PIMS.

Box 27. (Federal Issue) Responsible AM/OD completes corrective actions and closes PIMS record.

Box 28. (Federal Issue) End.

ISSUE PRIORITIES

The Priority rating system is designed to help managers and staff determine the relative importance of issues based upon the professional judgment of the Lead Assessor and the Issues Screening Team. The priority levels described below are aligned with those used by the Management and Operating (M&O) contractor.

1. **PRIORITY LEVEL 1.** Major event or systemic breakdown in safety, Integrated Safety Management, or management interface involving death or serious injury to a person or shutdown of a critical facility. Critical impact on worker health, the public, the environment, facility operations, or regulatory compliance. Issues involving Headquarters or senior management attention at the site level. Examples include:
 - a. Any identified condition or event meeting DOE M 231.1-2, Occurrence Reporting and Processing System (ORPS) Significance Category 1 reportability criteria.
 - b. Any identified condition that demonstrates an inability to protect the public or environment from exposure to radioactive or hazardous material that exceeds or challenges contractual regulatory standards (e.g., Emergency Response Planning Guidelines—3 values) at or beyond the site boundary.
 - c. Any identified condition that negatively affects the effectiveness or ability of a safety class structure, system, or component, in a nuclear facility, to perform its safety function.
 - d. Any identified noncompliance with requirements that could result in fines or penalties >\$1M.
 - e. Any identified condition that negatively affects the ability to accomplish a program mission or project resulting in a delay of six months or longer and/or an overrun >1M.
 - f. Loss or compromise of classified information or diversion of special nuclear material (to be reported immediately to the Assistant Manager for Safety and Security [AMSS]).
 - g. The recurrence of a previously corrected Priority 2 condition.
 - h. Any identified condition that, if not promptly corrected, would lead to a condition or event that would meet one of the above criteria.

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2. PRIORITY LEVEL 2. Issues requiring senior management attention. Major impact on worker health, the public, the environment, facility operations, or regulatory compliance. Examples include:
 - a. Any identified condition or event meeting DOE M 231.1-2, ORPS Significance Category 2 reportability criteria.
 - b. Office of Enforcement Reportable Noncompliance (unless other Priority Level 1 criterion also met).
 - c. Any condition that negatively affects the effectiveness or ability of a safety significant structure, system, or component, in a nuclear facility, to perform its safety function.
 - d. Any condition that negatively affects the ability of an item to perform a function needed to provide significant levels of defense in depth.
 - e. Any condition that negatively affects the effectiveness or ability of a Mission Critical 1 item to perform its needed function.
 - f. Any identified noncompliance with requirements that could result in fines or penalties >\$500K.
 - g. Any identified condition that negatively affects the ability to accomplish a program mission or project resulting in a delay of three months or longer and/or an overrun >500K.
 - h. Any identified condition or event that causes or could cause significant impact to social, economic, political, or cultural values that create unfavorable public opinion that directly or indirectly results in a program interruption or in damage to the reputation of the M&O contractor and/or Department of Energy (DOE)/National Nuclear Security Administration (NNSA).
 - i. Loss or compromise of Unclassified Controlled Nuclear Information or Sensitive Unclassified Information (to be reported immediately to AMSS)
 - j. The recurrence of previously corrected Priority 3 condition.
 - k. Any identified condition that, if not promptly corrected, would lead to a condition or event that would meet one of the above criteria.
3. PRIORITY LEVEL 3. Requires line-management attention and Project Manager/ Subject Matter Expert/Facility Representative follow-up. Weakness in a program,

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system, or management structure. Marginal to moderate impact on worker, health, the public, facility operations, or regulatory compliance. Examples include:

- a. Any identified condition or event meeting DOE M 231.1-2, ORPS Significance Category 3 reportability criteria.
 - b. Any identified condition or event meeting DOE M 231.1-2, ORPS Significance Category 4 reportability criteria, which requires the development of corrective actions to prevent recurrence.
 - c. Any identified noncompliance with requirements (unless Priority 4 criteria apply).
 - d. Any identified condition that results in a delay of program mission or project accomplishment > one month.
 - e. Any written notification from an outside regulatory agency that an activity is considered to be in noncompliance with a schedule or requirement (e.g., Notice of Violation, Notice of Noncompliance, Warning Letter, Finding of Violation, Administrative Order, or a similar type of notification or enforcement action.)
 - f. The recurrence of a previously corrected Priority 4 condition.
 - g. Any identified condition that, if not promptly corrected, would lead to a condition or event that would meet one of the above criteria.
4. PRIORITY LEVEL 4. Issues that require tracking and trending of data for historical purposes. Negligible impact on worker health, the public, the environment, facility operations, or regulatory compliance. Examples include:
- a. Any identified condition or event meeting DOE M 231.1-2, ORPS Significance Category 4 reportability criteria where the development of recurrence controls are not possible or not required.
 - b. Noncompliant conditions that:
 - (1) Do not challenge a safety basis.
 - (2) Are not associated with Technical Safety Requirements.
 - (3) Are not systemic or programmatic in nature.
 - (4) Are not recurrences of the same, previously corrected condition.

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- (5) Are easily corrected either on the spot or with only minimal corrective actions.
 - c. Have no effect on maintaining program mission or project completion within schedule and budget.
5. Opportunity for Improvement. An identified condition or practice which, while not a violation of an established requirement, may indicate less than optimal performance and is raised to the attention of management for consideration of possible future action.
6. Noteworthy Practice. An approach, practice, system, or process that extends beyond meeting base DOE and NNSA requirements, and that has potential application to other organizational elements or functional areas because of its contribution to the effectiveness of high level of performance.

ACRONYMS

AIP	Assessment Implementation Plan
AM	Assistant Manager
AMEM	Assistant Manager for Environmental Management
AMSO	Assistant Manager for Site Operations
AMSS	Assistant Manager for Safety and Security
ASM	Assessment Module
ASRP	Assessment Report
CAP	Corrective Action Plan
CAS	Contractor Assurance System
CaWeb	Contractor-Maintained Issues Management System
CRAD	Criteria and Review Approach Document
DOE	Department of Energy
DPO	Differing Professional Opinion
ES&H	Environment, Safety, and Health
EC	Executive Council
FAM	Functional Area Manager
FR	Facility Representative
HQ	Headquarters
HSS	Office of Health, Safety, and Security (Formerly Oversight and Assessment [OA])
IA	Independent Assessment
ISM	Integrated Safety Management
IST	Issues Screening Team
JAS	Joint Assessment Schedule
JORRB	Joint Oversight Requirements Review Board
LO	Line Oversight
LOCAS	Line Oversight and Contractor Assurance System
M&O	Management and Operating
MAS	Master Assessment Schedule

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MSSP	Management System Steering Panel
NA-10	NNSA Office of Defense Programs
NNSA	National Nuclear Security Administration
NNSA/NSO	NNSA Nevada Site Office
NP	Noteworthy Practice
NST	Nuclear Safety Team
NvE	Nevada Enterprise
OD	Office Director
OFI	Opportunity for Improvement
OAA	Operational Awareness Activity
ORPS	Occurrence Reporting and Processing System
ORR	Operational Readiness Review
PAG	Performance Assurance Group
PIMS	Pegasus Information Management System
POC	Point of Contact
RA	Readiness Assessment
S&S	Safeguards and Security
SC	Service Center
SME	Subject Matter Expert
SSIMS	Safeguards and Security Information Management System
SSOR	Safety System Oversight Representative