

**Department of Energy**

Washington, DC 20585

January 4, 1996

Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
Suite 700
625 Indiana Avenue, N.W.
Washington, D.C. 20004

Dear Mr. Chairman:

The December 1995 deliverable called for in the Department's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 94-4 is enclosed. The specific deliverable is Commitment 5.3, the Department's response to the Training Assistance Team Report evaluating key Federal personnel, except environment, safety, and health personnel, involved with safety-related activities at defense nuclear facilities at the Y-12 Plant.

If you have any questions, please contact me or have your staff contact Phil Aiken of my staff at (301) 903-4513.

Sincerely,

A handwritten signature in black ink, appearing to read "T. P. Seitz".

Thomas P. Seitz
Deputy Assistant Secretary for
Military Application and
Stockpile Management
Defense Programs

Enclosure

cc w/enclosure:
M. Whitaker, EH-9



DOE 94-4 Implementation Plan
Commitment 5.3
Training Program Action Plan

DECEMBER 1995

SECTION I: INTRODUCTION

On September 27, 1994, the Defense Nuclear Facilities Safety Board (DNFSB) issued Recommendation 94-4 dealing with Deficiencies in Criticality Safety at the U.S. Department of Energy (DOE) Oak Ridge Y-12 Plant. The Secretary of Energy accepted the Recommendation on November 18, 1994, and the Department issued an Implementation Plan on February 24, 1995. Technical Competence is the fifth of eight tasks included in the DOE Implementation Plan for Recommendation 94-4. Task 5 is further divided into 6 commitments.

Commitment 5.1 was met with the development and issuance of the Training Assistance Team (Team) Program for Key Federal Personnel at the DOE Oak Ridge Y-12 Plant, dated June 1995. In August and September of 1995, the Team performed an assessment of Key Federal Personnel at the DOE Oak Ridge Y-12 Plant. The issuance of the assessment report from the August and September review, dated October 1995, meets the deliverable required in Commitment 5.2. This action plan addressing the recommendations of the October assessment report meets the deliverable required in Commitment 5.3. There is a parallel process being performed to identify and address deficiencies related to DOE personnel reporting to the Assistant Secretary for Environment, Safety, and Health. Commitments 5.4, 5.5, and 5.6 apply to the contractor evaluation and follow the same three steps as the Federal evaluation. The due dates for these items are September 1995 (this commitment was met), February 1996, and April 1996.

The purpose of this Training Assistance Team visit was to evaluate the technical competence of key Department personnel involved with safety-related activities at the Y-12 Plant. The Team reviewed the experience, training, and performance of key personnel. The Team utilized specific performance objectives, review criteria, and approaches delineated in the Program Plan, which was issued in June 1995. The Team visit was conducted at the Y-12 Site on August 14-18, 1995, with a follow-up visit to the Headquarters Office of Site Operations (DP-24) Y-12 Team on September 6-7, 1995.

This Action Plan is divided into three sections. Section I, Introduction; Section II, Headquarters, DP-24, Action Plan; and Section III, Oak Ridge, Y-12 Site, Action Plan.

SECTION II: HEADQUARTERS, DP-24, ACTION PLAN

The Team made three recommendations directed at DOE Headquarters. Of these three recommendations, two have been completed. Actions on closing the last recommendation are continuing and will be completed by June 28, 1995. This will result in full implementation of a DP-24 technical qualification program consistent with the DOE Implementation Plan for DNFSB Recommendation 93-3.

The Team made the following Recommendations for DP-24:

DP-24 line management ownership and commitment to training needs to be strengthened:

1. Designate a DP-24 training driver to aggressively implement the Technical Qualification Program.

Response:

Commander Samuel Johnson, Deputy Director, Office of Site Operations (DP-24), has been assigned the primary responsibility for developing and implementing a program to achieve full implementation of the Technical Qualification Program. DP-24 is currently on schedule to meet the December 31, 1995, commitment in the DNFSB 93-3 Implementation Plan to have a functional area qualification program in place.

2. Assign DP-24 Y-12 Team staff to a technical functional area (vs. technical manager) to provide a technically stronger team and simplify the overall process.

Response:

All DP-24 technical personnel have been assigned a technical functional area. DP-24 management has met individually with each technical staffer to identify a primary technical functional area and additional functional areas as necessary based upon job requirements. Applicability and level of knowledge required for each competency has been documented for all applicable technical functional areas, as well as for the General Technical Base Qualification Standard and the DP-24 Qualification Standard.

3. Ensure managers include specific goals and training requirements of the staff in the employee IDPs.

Response:

The IDPs for all technical personnel have been revised to reflect the necessary competencies from the applicable qualification standards. DP-24 has begun determining which competencies have been met through equivalencies, training, education, or experience. This effort will be completed by March 29, 1996. DP-24 has been working toward identifying which competencies can be met through existing training programs, and documenting this in the IDPs. DP-24 is on schedule to meet the commitments from the DOE Implementation Plan for DNFSB Recommendation 93-3.

SECTION III: OAK RIDGE, Y-12 SITE, ACTION PLAN

The Team made eleven recommendations directed at DOE Oak Ridge Operations Office (ORO)/Y-12 Site Office (YSO). Of these eleven, four have been completed (1b,2a,4,5); two are considered to have been met through improvements to existing programs (2b,2c); one will be completed during the summer of 1996 (1d); one may require additional resources to expedite, but ORO is committed to an accelerated completion schedule (3); one will be revisited after resumption of Y-12 operations (6); and two have been considered and believed would lessen the current focus on training needs and DNFSB 93-3 implementation at Oak Ridge defense nuclear facilities (1a,1c).

The Team made the following Recommendations for ORO/YSO:

1. Line management ownership and commitment to training needs to be strengthened:
 - a. TDD should report directly to the ORO Manager/Deputy Manager.

Response:

The Training and Development Division (TDD) was formed in October 1993 in response to recommendations by the DNFSB and to demonstrate ORO's commitment to a skilled and technically competent work force. This division also provided the needed focal point for consistent implementation of DOE training policies and initiatives. The TDD Director currently reports to the Assistant Manager for Defense Programs. This reporting relationship was established by ORO to provide a high level of commitment to Federal and contractor training and qualification programs at defense nuclear facilities which were being emphasized by the DNFSB. However, the TDD also supports the other ORO non-defense program elements. The current location of TDD in the ORO organization has been effective in meeting the objectives for which it was created and has proved to be a productive means to raise training issues to the highest levels of ORO Management. As training needs and emphasis changes, ORO will revisit this recommendation.

- b. A proactive TDD technical training specialist should be matrixed to YSO and should report directly to the YSO Manager.

Response:

ORO agrees with the recommendation and in response has

matrixed a senior and experienced TDD Technical Training Specialist to the Y-12 Site Office (YSO) during October. This individual is physically located at the YSO and has been essentially dedicated to the YSO in support of contractor oversight. In this matrix assignment, the TDD training specialist has assumed "responsibility and ownership" on behalf of the YSO for the contractor's training and qualification program and related contract obligations (DOE Order 5480.20A). In this capacity, the training specialist reports directly to the Chief, Y-12 Program Management Branch (where functional responsibility for oversight of contractor training resides) and administratively to the Director, TDD. This matrix arrangement has already begun to pay dividends by providing a single point of contact for the contractor and DOE for Y-12 training related issues.

In order to strengthen YSO Federal training initiatives, a General Engineer within the Program Management Branch has been temporarily assigned lead responsibility for Federal training (collateral duty). This assignment complements the administrative training duties of the DP Support Specialist and the facility representative (FR) qualification efforts. These actions have provided the necessary focus to formulate a path forward for YSO compliance with the 93-3 Technical qualification Program. Additional Federal training initiatives are supported by the YSO Senior Nuclear Engineer and lead facility representative who are overseeing the detailed development of facility specific competencies and the associated training materials. As the YSO Restart Team is phased out, one of the operations engineers, who has an extensive training background, will assume the YSO lead for federal training.

- c. ORO should designate a lead senior technical manager and technical representatives from all ORO line organizations to work together and be responsible for providing direction and guidance to TDD and line staff for effective and efficient implementation of 93-3.

Response:

As stated earlier, the TDD was established to provide a focal point for consistent implementation of DOE training policies and initiatives. In support of that initiative, ORO has several working groups that deal with training issues. These include the Training Liaison Group whose members keep each Division informed of current training issues, available training courses, status of training funds, etc. The Director, TDD, or his staff coordinates this group. ORO also has a FR Working Group (composed of one FR from each site plus a

TDD representative), which works to ensure consistency across sites in the FR program, and a FR Policy Committee composed of the Manager, ORO, and Assistant Managers from each program. There is also a DNFSB Coordination Group chaired by the ORO DNFSB point of contact and made up of Division Directors. This group already discusses and tracks DNFSB concerns and commitments including 93-3 commitments. In addition, the TDD Director attends monthly Division Director meetings, COR meetings, and Program Update meetings with the Assistant Manager for Defense Programs and the ORO Manager. TDD briefs these managers regarding proposed policy/direction and solicits their feedback on a continuing basis. It is ORO's position that adequate coordination between program elements already exist and another committee is not needed.

- d. YSO line management should formally identify training needs and hold TDD accountable for specific deliverables. This is normally accomplished by a training plan developed by the technical line management with input from TDD.

Response:

ORO agrees with the recommendation. YSO line management will continue to identify training needs by providing TDD with copies of Individual Development Plans and responding to training needs surveys as has been done in the past. However, a more formal tasking process will be established to ensure adequate communication. In addition, YSO line management has provided TDD with Technical Qualification Record information prepared for the Technical Qualification Program which includes needed developmental activities such as training courses or self-study modules. TDD will review this information and fold it into the annual training plan to ensure that the training needs of YSO line management are met.

2. TDD needs to be aggressive in identifying and supporting line management needs:
 - a. Provide a matrixed technical training specialist to report full time to the YSO Manager.

Response:

ORO agrees with the recommendation. See response to item 1.b.

- b. Develop technical training materials in support of line management needs for self-study and on-the-job training.

Response:

ORO agrees with the recommendation. Since its origination, the TDD has provided Y-12 with various training related services, materials, products, and expertise. These include FR qualification materials and support, position standards/ individual development plans guidelines and evaluation, 93-3 Technical Qualification Workshops, contractor surveillance and assessment support, and local delivery of various training classes at YSO request. However, communication of YSO training needs and TDD training support have been inconsistent and informal in the past. TDD and the YSO are working to make this a more formal process as discussed in the response to recommendations 1.c and 1.d.

- c. Develop and present formal performance-based training.

Response:

The TDD will be assisting YSO with the identification of developmental activities as discussed in recommendations 1.c, 1.d, and 2.b. It is not always necessary nor appropriate to develop technical training materials. In most cases TDD procures courses for use at ORO or makes use of the many and varied materials already developed by contractors. It is neither cost effective nor efficient to develop new technical training materials when so many options already exist. The development of performance-based training will only be required if suitable training does not already exist.

3. YSO, with support from TDD, needs to expedite development of site-specific training for Facility Representatives and technical support personnel.

Response:

ORO agrees with the recommendation. Y-12 is developing a site-specific training qualification standard. This standard will consist of office, facility, and position specific competencies. The office and position specific competencies have largely been developed and are already incorporated into the TQRs for each position. The facility specific competencies are being developed primarily for the facility representatives, however, some of the competencies will also apply to other technical staff at a higher level. Once the site specific training qualification standard is approved, the TQRs will be revised to reflect the approved facility specific competencies. Training materials,

study guides, test questions, etc. will then be developed to support personnel developmental activities. YSO will also take advantage of contractor facility-specific technical training classes when available. These activities will be completed in a timely manner in order to comply with full implementation of 93-3 by May 1998. However, YSO is working toward a much more aggressive internal implementation schedule.

4. YSO needs to provide timely follow-up and closure of deficiencies and commitments from the contractor to ensure improvement is continually achieved.

Response:

ORO agrees with the recommendation. This recommendation was based on the fact that timely followup to joint TDD & YSO surveillances were not being performed. The senior technical training specialist has been assigned the task of revisiting findings from previous training surveillances. All findings that are still valid will be incorporated into the YSO deficiency tracking System (DTS).

YSO improved its tracking of deficiencies and corrective actions with the establishment of the DTS in August 1995. Prior to this time, YSO relied on the contractor's Energy Systems Action Management System (ESAMS) database and manual methods to track deficiencies. YSO is currently revisiting previously identified deficiencies to verify closure. Any item that is still open will be assigned a DTS tracking number and assigned to an individual for monitoring and closeout. Additionally, monthly status reports are being reviewed by management to ensure that open items are being appropriately dispositioned.

In June of 1995, YSO adopted a monthly surveillance program where all YSO surveillance findings are discussed, tracked, and then transmitted to the contractor under one monthly report. The surveillances are performed based on an annual assessment plan. The monthly reports identify areas of improvements, strengths, weaknesses, and deficiencies. The reports are discussed with the contractor during monthly meetings prior to transmittal. Contractor responses to the monthly reports are due 30 days from receipt. Findings are assigned "follow up item" or "deficiency" tracking numbers to monitor when responses, corrective action plans, or corrective actions are due.

5. **YSO needs to define and implement Facility Representative roles and responsibilities during an emergency.**

Response:

ORO agrees with the recommendation. The roles of a Facility Representative (FR) during an emergency have been defined in the Oak Ridge Emergency Operation procedures. The role has been defined as providing on the scene assessment of the Incident Commanders Actions during an emergency and providing this information to the DOE Contracting Officer Representative (COR) in the Y-12 Emergency Operations Center (EOC). These roles and responsibilities have been discussed with each FR. To incorporate these responsibilities the following actions have been taken: 1) A red lanyard which enables the FR to access the site during an emergency have been distributed to the FRs; 2) The FR beepers have been coded for emergency notification by the Emergency Operations Center; 3) A mobile phone has been placed in the EOC for the FR to communicate with the COR during an emergency.

6. **The Restart Team including the Facility Representatives needs to be reconfigured into an Operations Branch reporting directly to the YSO Manager following resumption of operations.**

Response:

As a result of the stand down at Y-12, the YSO has increased facility representative staffing from two to six and has increased operation engineer staffing from one to two. The facility representatives (FR) currently report technically to the Senior Nuclear Engineer and administratively to the Y-12 Site Manager. The FR reporting relationship to the Site Manager was adopted to emphasize the importance of their role to the contractor. The FR program at Y-12 and their reporting relationship to the Site Manager have been commended by various oversight groups including the DNFSB staff and the 94-4 Task 4 Team. The operation engineers report to the YSO Restart Manager. This reporting relationship was established to integrate restart efforts with long-term, institutional improvements that were needed in the area of Conduct of Operations.

Oak Ridge Operations has revisited the Operation Branch concept but has determined that the current organization meets the needs of Y-12 at this time. This recommendation will be revisited in the future for potential incorporation as additional areas are restarted and the Restart Team downsized.

DP-HQ, DP-24 CORRECTIVE ACTION PLAN

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-HQ-1	Designate a DP-24 training driver	Assign Commander Samuel Johnson, Deputy Director, DP-24 responsibility for DP-24 Qualifications	December 31, 1995	Action completed
T5-HQ-2	Assign DP-24 staff to a technical functional area qualification std	Assign technical functional areas for all DP-24 technical staff	December 31, 1995	Action completed December 8, 1995

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-HQ-3	Ensure managers include specific goals and training requirements of the staff in the IDPs	a) Identify needed competencies	December 1995	Action Completed Dec 8, 1995.
		b) Evaluate existing equivalencies and completion of competencies	March 29, 1996	Began Dec 1995.
		c) Identify formal training to meet competencies	June 28, 1996	Began Dec 1995.
		d) Identify professional goals	June 28, 1996	Scheduled to begin April 1996.

OAK RIDGE, Y-12 SITE, CORRECTIVE ACTION PLAN

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-ORO-1a	TDD should report directly to ORO Manager/Deputy Manager	None. TDD currently reports to the Assistant Manager for Defense Programs. This provides needed focus on training at defense nuclear facilities.	None	

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-ORO-1b	TDD technical training specialist should be matrixed to YSO and report to YSO Manager	1)Matrix a TDD Technical Training Specialist to YSO (reporting to the Chief, Y-12 Program Management Branch) .	October 1995	Action Completed October 1995.
		2)Assign a YSO technical employee lead responsibility for federal training to assist in developing the path forward for YSO compliance with DNFSB 93-3.	November 1995	Action Complete. A YSO General Engineer is assigned this as a collateral duty. This responsibility will be assumed by a YSO Restart Team engineer after the Restart Team is phased out.

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-ORO-1c	ORO designate a lead senior technical manager and technical reps from all ORO line organizations for the implementaion of DNFSB 93-3	None. TDD is responsible for consistent ORO implementation of training policies and initiatives. A Training Liaison Group (and others) provide opportunities for direction and feedback.	None	
T5-ORO-1d	YSO line management should formally identify training needs and hold TDD accountable for specific deliverable.	Revise annual training plan to ensure YSO line management training needs are met.	Summer 1996	IDP and Technical Qualification Record information has been provided to TDD for inclusion into the annual training plan.
T5-ORO-2a	TDD provide a matrixed technical training specialist to report full time to the YSO manager.	See T5-ORO-1b(1)	October 1995 See T5-ORO-1b(1)	Action Complete See T5-ORO-1b(1)

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-ORO-2b	TDD develop technical training materials in support of line management needs for self-study and OJT.	TDD continue to work with line organizations to develop/procure technical training materials as needed.	Ongoing	This is a permanent part of the TDD training function. The identification of needed training materials is being formalized as discussed in T5-ORO-1c/1d above.
T5-ORO-2c	Develop and present formal performance-based training	Training needs and developmental activities will be identified and acquired as discussed in T5-ORO-1c/1d/2b. Training will only be developed when suitable training does not already exist.	Ongoing	This is a permanent part of the Oak Ridge Training functions. When needed training does not exist or can not be procured, appropriate training will be developed and presented locally.

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-ORO-3	YSO needs to expedite development of site-specific training for Fac Reps and technical support staff.	Develop a Y-12 site specific training qualification standard and associated training courses.	May 1998	May 1998 is the commitment contained in the DOE Implementation Plan for DNFSB 93-3. While a more aggressive schedule is being pursued, this effort is heavily dependent upon the availability of necessary resources. Efforts will be accelerated throughout 1996 to expedite this task as resources permit.

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-ORO-4	YSO needs to provide timely follow-up and closure of deficiencies and commitments from the contractor.	Develop and implement a deficiency tracking system	December 1995	Action Completed. YSO has developed and implemented (6/95) a monthly assessment program to ease transmitting and tracking of identified deficiencies. In August 1995, YSO established a YSO tracking system to improve monitoring of deficiencies. Previously identified findings are being revisited and added to the system as appropriate.
T5-ORO-5	YSO needs to define and implement Fac Rep roles and responsibilities during an emergency.	Define and implement Fac Rep roles and responsibilities during an emergency.	November 1995	Action Completed. The roles of Fac Reps during an emergency have been defined in the Oak Ridge Emergency Operation procedures. This has been discussed with each Fac Rep.

ID Number	Recommendation	Action Proposed	Target Due Date	Action Status
T5-ORO-6	Restart Team and Fac Reps should become an Operations Branch reporting to the YSO Manager following resumption of operations.	After Y-12 resumption of operations, Oak Ridge Operations will revisit the practicality of reconfiguring the Restart Team and Fac Reps into an Operations Branch	Post Y-12 Resumption of Operations	The current YSO configuration meets the needs of Y-12 at this time; however, this recommendation will be revisited after resumption.