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MEMORANDUM FOR INGRID KOLB
DIRECTOR
OFFICE OF MANAGEMENT

THROUGH: KEVIN T. HAGERTY
DIRECTOR
OFFICE OF INFORMATION RESOURCES

FROM: *for* GLENN S. PODONSKY *W.A. Schroeder*
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SUBJECT: Revised Notice of Intent to Develop Department of Energy Guide 226.1-2,
Federal Line Management Oversight of DOE Nuclear Facilities

PURPOSE: This memorandum provides a revised justification for the development of Department of Energy (DOE) Guide (G) 226.1-2, *Federal Line Management Oversight of DOE Nuclear Facilities*. This new nonmandatory Guide will provide narrowly scoped information for developing and implementing effective processes. This Guide will make extensive use of references to other existing management system directives to avoid unnecessary duplication.

JUSTIFICATION: Background: The Department's high-level expectation for a Department-wide oversight and assurance process for safety and security is established in DOE Policy (P) 226.1B, *Department of Energy Oversight Policy*, dated April 25, 2011. DOE Order (O) 226.1B, *Implementation of Department of Energy Oversight Policy*, dated April 25, 2011, provides requirements for the implementation of the Department's Oversight Policy.

The previous justification memorandum (see attachment 1) was discussed during the Directives Review Board (DRB) meeting on May 5, 2011. The Office of Health, Safety and Security (HSS) was asked to consult with program offices and quality assurance subject matter experts to ensure that there will be no duplication with existing Quality Assurance (QA) Guide DOE G 414.1-1B, *Management and Independent Assessment Guide*, issued on September 27, 2007. To avoid overlap, the developers of the Oversight Guide will reference the QA guides when appropriate. Additionally, a Page Change will be issued to clarify the title and content of G 414.1-1 related to interface with the various management system requirements. The oversight process has many other important elements besides management and independent assessments. These other elements will be addressed in the new Guide, along with references to existing documents to ensure a sensible and integrated approach is taken to satisfy DOE O 226.1. Some topics to be covered in the new Oversight Guide include evaluation of the Field Office and contractor assurance systems (e.g., issue management, corrective actions, and associated objectives and performance measures). Likewise, the initiative to develop a new



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Integrated Management System (IMS) guide also necessitates that the Oversight Guide effort be conducted in a coordination ~~manner~~. *with IMS efforts.*

The Department has longstanding plans and a Secretarial commitment to the Defense Nuclear Facilities Safety Board (DNFSB) to develop additional DOE-wide guidance on the conduct of line oversight at nuclear facilities.

- (1) In response to Board Recommendation 2004-1, *Oversight of Complex, High-Hazard Nuclear Operations* (see attachment 2 -- October 12, 2006, letter from Secretary of Energy Samuel W. Bodman to DNFSB Chairman A. J. Eggenberger); and
- (2) More recently, the Deputy Secretary's April 19, 2011, approval memorandum for DOE Oversight Policy and Order committed the Department to issue an Oversight Guide to address the DNFSB recommendation no later than September 30, 2011 (see attachment 3).

Summary of Development Process: A working group, co-led by the HSS Office of Health and Safety, and a representative of Line Management (Al MacDougall, Senior Safety Advisor, National Nuclear Security Administration (NNSA)), will be formed to develop the draft Oversight Guide. This working group will include designated representatives from the line management Program Secretarial Offices with extensive experience in performing line oversight at DOE nuclear facilities. Development of this Guide will follow the process defined in DOE O 251.1C, *Departmental Directives Program*, dated January 15, 2009.

Applicability: The Guide applies to DOE, including NNSA, Federal Elements performing line oversight of DOE nuclear facilities.

Major Changes: This will be a new Guide. Since it will address processes for Federal line oversight of nuclear facilities, the Guide will be added to the list of Directives requiring Central Technical Authority concurrence prior to revision or canceling in Attachment 2 of DOE Order 410.1, *Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*.

Recommended Development Schedule: The Deputy Secretary has committed to issue this Guide by September 30, 2011. The development timeline shown below is designed to meet this challenging commitment.

IMPACT: No conflicts with other Directives are identified. No impacts to departmental functions or operations are anticipated.

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Attachments

- March 25, 2011, Justification Memorandum
- October 12, 2006, letter to DNFSB Chairman
- April 19, 2011, Deputy Secretary's Approval Memorandum

Concur:  Nonconcur: _____ Date: 6-9-11

Timeline: Schedule for Directives Development

	<u>Standard</u> (Days)	<u>Proposed</u> (Days)
Draft Development (Writer)	60	60
Process/Post (MA-90)	5	5
Review and Comment (Interested Parties)	45	30
Comment Resolution (Writer)	30	20
Concurrence	15	5
Total	155	120