

SUPPLEMENTAL DIRECTIVE

NNSA SD 226.1C

APPROVED: 10-01-19

EXPIRES: 10-01-22

NNSA SITE GOVERNANCE



NATIONAL NUCLEAR SECURITY ADMINISTRATION
Office of Safety, Infrastructure, and Operations

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NNSA SITE GOVERNANCE

1. PURPOSE. This Supplemental Directive (SD) establishes the National Nuclear Security Administration (NNSA) Site Governance Model as the framework that the Federal Government and NNSA's contractor partners work within to help ensure effective mission performance and operational excellence. This SD supplements the requirements of Department of Energy (DOE) Policy (P) 226.2, *Department of Energy Oversight Policy*, and DOE Order (O) 226.1B, *Implementation of DOE Oversight Policy*.
2. AUTHORITY.
 - a. DOE P 226.2, *Department of Energy Oversight Policy*, dated 8-9-16.
 - b. DOE O 226.1B, *Implementation of DOE Oversight Policy*, dated 4-25-11.
3. CANCELLATION.
 - a. SD 226.1B, *NNSA Site Governance*, dated 8-12-16.
 - b. BOP-10.003, *Site Integrated Assessment Plan (SIAP) Development, Updating, and Reporting*, dated 1-18-12.
 - c. Unnumbered NA-50 document, *Approach to Safety Management Program Reviews*, dated 5-22-15.

Cancellation of a directive does not, by itself, modify or otherwise affect any contractual or regulatory obligation to comply with the directive. Contractor Requirements Documents (CRDs) previously incorporated into a contract remain in effect throughout the term of the contract unless and until the contract or regulatory commitment is modified to either eliminate requirements that are no longer applicable or substitute a new set of requirements.

4. APPLICABILITY.
 - a. Federal. This SD applies to all federal NNSA personnel who are involved on behalf of NNSA in managing, overseeing, or interfacing with NNSA Management and Operating (M&O), prime security, and prime environmental management contractors, and their sub-contractors.
 - b. Contractors. The CRD, provided as Attachments 1 and 2 of this SD, sets forth requirements of this directive that apply to NNSA M&O, prime security, and prime environmental management contractors, referred to as *contractors* or *contractor partners* throughout this SD.

The CRD must be included in M&O, prime security, and prime environmental management contracts with NNSA.
 - c. Equivalency. In accordance with the responsibilities and authorities assigned by Executive Order 12344, codified at 50 United States Code sections 2406 and

2511, and to ensure consistency throughout the joint Navy/DOE Naval Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices pertaining to this Directive for activities under the Director's cognizance, as deemed appropriate.

5. SUMMARY OF CHANGES. This revision clarifies, and provides, guidance on some aspects of NNSA governance in Appendixes A through C. This revision incorporates NNSA best practices, replaces some unauthorized directives, and formalizes agreed upon NNSA functions. The appendixes pertain to field office program liaison (PL) functions, safety management program reviews, and site integrated assessment plans. This revision also emphasizes the need for timely communication and coordination between NNSA team elements when issues arise that could challenge mission delivery.
6. BACKGROUND. DOE P 226.2 established DOE's expectations for the implementation of a comprehensive oversight process. DOE expects that the contractor's governance processes will provide assurance that the system of management controls, when properly implemented, ensures an efficient means of meeting applicable regulatory and mission requirements. NNSA leveraged key successes from DOE organizations with responsibility for overseeing M&O contractors to improve the Site Governance Model. These improvements, as laid out in this SD, are intended to provide guidance and process requirements that will foster a strategic relationship that involves effective communications.

This SD relates specifically to the NNSA Site Governance Model, which consists of three separate, but linked, systems that provide insight to mission performance: federal oversight, contractor assurance, and contractor corporate parent(s) oversight and assurance. Site Governance Systems that implement the Governance Model are not required to be identical in terms of processes, tools, and methods across the NNSA. Rather, the expectation is that the Site Governance System necessarily reflects the unique programs and mission of each site. This SD establishes the site governance approach consistent with the *NNSA Governance & Management Framework*, dated March 27, 2019, which provides the foundation for NNSA to execute its strategic vision.

The *Governance & Management Framework* emphasizes training for the NNSA workforce to help institute change/culture management initiatives, provide clear and transparent communication, support integration of new processes and ideas, provide continuity of operations, and facilitate an unambiguous understanding of roles and responsibilities. NNSA's Management and Budget office (NA-MB) leads development of governance awareness training for executives and workers to assist them in executing the principles and requirements documented in this SD.

7. REQUIREMENTS.

a. NNSA Site Governance Model.

- (1) NNSA must operate within a Site Governance Model that comprises three overlapping systems for evaluation. These systems focus on continuous improvement of all activities and functional areas that can affect mission reliability: (1) the federal team, including program, functional, and field offices; (2) the contractor partner operating the sites or facilities; and (3) the contractor partner corporate parent, as specified by contract. Effective governance requires that all three entities work together to ensure reliable mission performance. Attachment 2 of this SD provides details about the attributes of the NNSA Site Governance Model and those governance and management systems the NNSA Team uses to implement the Model.
- (2) The depth of federal oversight must be based on the demonstrated strength of the contractor's management systems and the risks associated with unsatisfactory performance. High-risk activities and areas with significant performance weaknesses must be evaluated to determine the necessary activity-specific oversight, as defined by the Federal Oversight System Description document.
- (3) The NNSA Site Governance Model, consisting of management systems and tools used by federal and contractor organizations, must be transparent and encourage efficiencies. Data generated from oversight and assurance systems and activities must be shared to allow each partner to identify positive and adverse indicators and opportunities for improvement.

b. Federal Oversight System.

- (1) The site Federal Oversight System Description must describe processes for evaluating contractor assurance, contractor performance, and federal assessment activities.
- (2) Federal offices (program, functional, and field) must identify oversight activities in a Site Integrated Assessment Plan (SIAP) using attributes outlined in Appendix C of this SD.

c. Governance Peer Reviews.

- (1) Field oversight and contractor assurance systems must undergo peer review to evaluate implementation. This review must include the governance attributes provided in Attachment 2 of this SD.
- (2) Peer review teams must include the NNSA Team — site M&O partner and federal employees representing field, program, and functional offices, as available.

- (3) Each peer review team must submit reports and provide its respective briefings on oversight or assurance to the Field Office Manager (FOM), the applicable program and functional offices, the Principal Deputy Administrator, Site Manager/Laboratory Director/Plant Manager, and the corporate parent board chairperson or equivalent (if consistent with the contract).

8. RESPONSIBILITIES.

a. Office of Policy and Strategic Planning (NA-1.1).

- (1) Reviews this SD periodically and makes recommendations for any necessary updates.
- (2) Evaluates the NNSA Site Governance Model for improvement.
- (3) Reviews and retains site Federal Oversight System Descriptions.

b. Office of Safety, Infrastructure, and Operations (NA-50).

- (1) Serves as the office of primary interest for this SD.
- (2) Maintains awareness and oversight of field office operations and activities per NNSA SD 226.1-1A, *Headquarters Biennial Review of Nuclear Safety Performance*, and Appendix B of this SD, (Safety Management Program Reviews).

c. Program Managers (PMs).

- (1) Allocate and oversee appropriated funds to execute work at NNSA sites, plants, and laboratories.
- (2) Set program expectations, program goals and priorities, and integrate overall program plans and priorities.
- (3) Establish general and site-specific program requirements to include scope, cost, and schedule; develop program implementation plans and guidance for inclusion in appropriate work authorizations (WAs); and evaluate contractor performance against program requirements. Facilitate and lead coordination of program priorities across the enterprise.
- (4) Provide technical direction to the contractor through an authorized field Contracting Officer's Representative (COR), or the Contracting Officer (CO), with parallel communication to the field office(s).
- (5) Identify program needs. Determine site funding allocations, milestones, and expectations for site performance.

- (6) Track and evaluate program mission work performance by monitoring progress on program goals and objectives.
- (7) Work with field offices and functional managers (FMs) to negotiate programmatic cross-site and site-specific performance goals and objectives, and to assess progress on these goals and objectives. Resolve any mission impact due to environment, safety and health (ES&H), quality, or safeguards and security issues, and other functional or program conflicts, considering input provided by the field office and the FMs.
- (8) Seek out and consider input from the field offices and the FMs.
- (9) Determine whether actions taken or planned meet requirements for their program.
- (10) Engage with functional offices and the field office Program Liaisons, as outlined in Appendix A.

d. Functional Managers (FMs).

- (1) Ensure implementation of requirements in their functional areas and support site implementation of crosscutting functional areas to accomplish NNSA's mission. Crosscutting functional areas may include nuclear safety, safeguards and security, cybersecurity, ES&H, quality, emergency management, day-to-day operations and maintenance, and business and contract management.
- (2) Coordinate with field offices and PMs to ensure strong functional area performance at the sites.
- (3) Ensure functional considerations (e.g., safety, security, and quality) are fully integrated in the field oversight process.
- (4) Determine whether actions taken or planned by the FOMs and PMs meet requirements in their functional area.
- (5) Maintain operational awareness of field office and site operations. Provide technical support if requested by the field office.
- (6) Communicate potential adverse mission-impacting issues to the field office and PMs.
- (7) Engage with field office PLs, as outlined in Appendix A.

e. Field Office Managers (FOMs).

- (1) Ensure the effectiveness of the NNSA Site Governance Model and Systems at their assigned site.

- (2) Serve as the primary point of contact between NNSA and contractor leadership by maintaining consistent and open communication, fulfilling long-term site stewardship responsibilities, and performing critical functions while promoting continuity during contract transition.
- (3) Lead the evaluation of the contractor's overall performance, including the evaluation and use of a contractor assurance system (CAS).
- (4) Prepare the site Federal Oversight System Description in collaboration with the functional and program offices. Approve the site Federal Oversight System Description and forward to the Office of Policy (NA-1.1).
- (5) Ensure the field office performs systems-level oversight and drives performance through evaluation and engagement in nuclear safety and security, while promoting efficient mission performance across all programmatic areas.
- (6) Oversee operations conducted at the site and promptly communicate mission impact issues to PMs and FMs. Collaborate with PMs and FMs on safety, security, and quality concerns where programmatic efforts may conflict with, or disrupt, mission execution.
- (7) Actively support the program offices and strive to enhance and reinforce information sharing between PMs and the contractor.
- (8) In consultation with PMs and FMs, balance programmatic execution against risks or concerns associated with operations and crosscutting mission functions. Integrate operational decision making at the site.
- (9) Accept, on behalf of NNSA, the risks associated with operations under their delegated authority. Apply the resources needed to address any undesirable consequences, subject to concurrence of other affected line managers.
- (10) Ensure that the CO incorporates the CRD into the contract. The Kansas City Field Office (KCFO) Manager reviews the requirements of this SD in accordance with the KCFO Operating Requirements Review Board process for applicability to the Kansas City National Security Campus contract.
- (11) Evaluate and approve the CAS description. (For situations where NNSA is the tenant or shares the services of the M&O partner with the DOE Program Landlord, the field office must follow the Memorandum of Agreement regarding CAS.)

- (12) Provide a copy of the approved SIAP to HQ functional and program offices at the beginning of each fiscal year.
- (13) Inform NA-50 of Safety Management Program review plans.
- (14) Notify PMs and FMs of the Program Liaison assignments.

f. FOMs, PMs, and FMs.

- (1) Execute responsibilities with respect to assigned duties and share in the responsibility and accountability for mission accomplishment and site stewardship.
- (2) Collaborate with each other to provide continuous oversight of mission performance while maintaining a DOE/NNSA enterprise-wide focus. Deliver consistent performance feedback to the contractor partners.
- (3) Promptly communicate emergent issues that could adversely affect mission delivery and collaborate to develop optimal responses.
- (4) Cooperate to resolve issues when the intended program scope may not be achievable or optimal. PMs and FOMs must agree on changes to contract scope prior to submitting to the CO.
- (5) Assess their staffing needs to determine whether there are sufficient, qualified personnel to conduct oversight activities consistent with comprehensive policies and guidance. Oversight may include review of, and insights from, CAS performance data.
- (6) Produce written assessment plans consistent with their respective responsibilities under Section 4.b.(2) of DOE O 226.1B, and according to Appendix C of this SD.
- (7) Obtain and integrate each site contractor's assessment and peer review schedules that form the basis for planned integrated assessments and operational awareness activities.
- (8) Maintain awareness of the contractor's processes to identify, prioritize, and address issues that affect mission performance.
- (9) Review DOE directives, emphasizing directives that are under revision or causing significant programmatic impacts. Recommend references to published best practices and industrial or consensus standards in Departmental directives, in lieu of DOE-specific language.

g. Field Office Contracting Officers (COs).

- (1) Appoint CORs and other personnel as authorized in the CO warrant.

- (2) Incorporate this SD into the *List of Applicable Directives* identified in the Laws, Regulations, and DOE Directives clause of the contracts.
- (3) Approve Work Authorizations, which the appropriate program office initiated or amended. Perform responsibilities and authorities consistent with the WA process in accordance with applicable directives while ensuring all WAs are reviewed by the PM and FM funding the work.

9. DEFINITIONS. See Appendix D.

10. REFERENCES. See Appendix E.

11. CONTACT. Associate Administrator for Safety, Infrastructure, and Operations, NA-50, 202-586-8246.

BY ORDER OF THE ADMINISTRATOR:



Lisa E. Gordon-Hagerty
Administrator

Attachments:

1. Contractor Requirements Document (CRD)
2. Attributes of NNSA Site Governance

Appendixes:

- A. Field Office Program Liaison
- B. Safety Management Program Reviews
- C. Site Integrated Assessment Plans
- D. Definitions
- E. References

ATTACHMENT 1: CONTRACTOR REQUIREMENTS DOCUMENT (CRD)
NNSA SD 226.1C, NNSA SITE GOVERNANCE

1. INTRODUCTION

The Management and Operating (M&O), prime security, or prime environmental management contractor is responsible for complying with the requirements of this CRD. The contractor is responsible for flowing down the requirements of this CRD to sub-contractors at any tier to the extent necessary to ensure the contractor's compliance with the requirements.

The contractor oversees the operations conducted at the site and has insights of how programmatic efforts may conflict with safety/security/quality concerns and mission needs. Contractors balance National Nuclear Security Administration (NNSA) programmatic execution against risks or concerns associated with operations and crosscutting mission functions. In collaboration with their field office and other federal oversight authorities, contractors ensure that risks are communicated and accept, on behalf of NNSA, the risks associated with the operations they are authorized to perform.

2. REQUIREMENTS

- a. The contractors must operate within a Site Governance Model with three overlapping systems of oversight as described in Attachment 2 of this Supplemental Directive (SD). Attachment 2 is incorporated by reference into the CRD, to the extent applicable to the contractor.
- b. The contractor's senior officer (Director, President, Laboratory Manager, or designee) must approve the site-level Contractor Assurance System (CAS). Depending on the terms of the specific contract, the contractor's parent organization or Board of Managers/Directors must either approve the site-level CAS, or be requested by the contractor to review and concur with the site-level CAS. The contractor must provide the CAS description to the Field Office Manager for review and approval. The contractor must submit any updates to the CAS description to the Field Office Manager for review and concurrence whenever significant changes occur.
- c. The contractor, in conjunction with its field office, must jointly review, upon request, DOE directive CRDs in the contract, or proposed to be in the contract, and provide recommendations on efficiencies to the appropriate NNSA headquarters (HQ) office.
- d. The contractor must undergo a peer review of its Site Governance Model and Systems, meeting the expectations of Attachment 2 of this SD, where applicable. Peer review teams include contractor employees and contractor parent representatives (if applicable).

- e. The contractor must plan, develop, maintain, and update an assessment schedule that is coordinated with the field office. The contractor must document the basis for the planned assessments to ensure there is transparency and clarity on risks, prioritization, and resource allocation.
- f. The contractor must identify, prioritize, and address issues that will, or may, affect mission performance. These include safety, security, quality, or any other operational or business issues that put mission delivery at risk.
- g. Any requirements regarding the corporate parent are set forth in the contract.

ATTACHMENT 2: ATTRIBUTES OF NNSA SITE GOVERNANCE

Note: This attachment in relevant part applies to both federal and contractor personnel.

The National Nuclear Security Administration (NNSA) Site Governance Model consists of three overlapping systems of oversight:

- Federal oversight performed by federal program, functional, and field offices
- Contractor assurance performed by the laboratories, plants, and sites
- Contractor corporate parent(s) oversight performed by the Management and Operating (M&O) partner corporate parent(s)

This forms a site governance approach (Figure 1) focused on continuous improvement of all activities and functional areas that can affect mission performance.



Figure 1: Governance Supports Mission Delivery

NNSA Site Governance Model.

The following attributes are hallmarks of an effective Site Governance Model. These attributes establish the framework for each site to evaluate their current assurance systems to determine

whether improvements are necessary and where improvement initiatives should be focused in order to meet the expectations of the Administrator.

Attributes of an effective Site Governance Model include:

- Experienced, competent federal and M&O partner line managers.
- A trusting, transparent, strategic partnership between NNSA, program and functional offices, and the field office; and site contractor management teams that benefit from the *constructive dynamic tension*¹ inherent in the contractual relationship.
- A trusting, transparent, strategic partnership between the NNSA leadership and the site contractor parent(s), to the extent permitted by contract.
- Federal and corporate parent oversight that is primarily systems-level and performance-based.
- The site-level governance system process, which is updated as necessary to remain user-friendly, transparent, and is used to make risk-informed decisions to manage the site.
- Risk-informed operational decisions that are made as close to the work being performed as feasible.
- Contracts where all partners are focused on continuous improvement and long-term safe, secure, and efficient site mission performances.
- Contractor and federal issues-management systems that are aligned, or well-integrated, to facilitate data mining and efficient collaborative exchange of information.
- Data generated from oversight and assurance activities are shared to allow each partner to identify positive and adverse indicators and opportunities for improvement.

Contractor Assurance System (CAS).

The CAS description specifies how the CAS is integrated with federal and corporate assurance systems, as well as key deliverables and commitments that will help validate compliance and mission performance. The system should manage and monitor all site activities that support the NNSA mission that could affect system reliability. The site-level assurance system can be the contractor's corporate management system or a combination of components making up a *system*. The site level assurance system should be built upon a foundation of enduring core principles that are appropriate for the mission performed at the site. These principles should include both a

¹ Constructive dynamic tension involves economic aspects of the contract in which the government incentivizes the contractor to perform the highest priority mission objectives with safety, security, economy, and efficiency through a learning organization that achieves continuous improvement. The government exploits that constructive dynamic tension to the financial benefit of the taxpayers, to the mission benefit of our citizens and allies, and to the operational benefit of our contractors.

focus on day-to-day performance, as well as long-term mission, personnel, and infrastructure support needs that better ensure the sustainability of enterprise resources critical to the success of our mission. The system should help the site to be a learning organization.

Attributes of an effective contractor's site-level assurance system include:

- A comprehensive description of the governance system with processes, risks and related mitigation, key activities, and accountabilities clearly identified.
- Timely notification and codification of significant governance system changes.
- Rigorous, risk-informed, credible self-assessments, and continuous feedback resulting in improvement activities, including usage of nationally recognized experts and other independent reviews, to assess and improve the contractor's work process through independent risk and vulnerability studies.
- Comprehensive analysis and evaluation of relevant performance data to identify negative performance trends, extent of condition, and systemic problems that should be corrected before they become significant issues.
- A site-level issues management system to identify and track issues to closure. The issues management process supports categorization, tracking, trending, and analysis of performance data. Corrective actions are clear, appropriate, and effective.
- Integration of the governance system with other management systems including Integrated Safety Management, Quality Assurance, and Integrated Safeguards and Security Management.
- Metrics and targets to assess performance, including benchmarking of key functional areas with other Department of Energy (DOE)/NNSA contractors, industry, and research institutions.
- Integration of external input received from the field office, NNSA, and DOE programmatic elements, corporate parents, the DOE Inspector General, the Government Accountability Office, other federal and state regulators, and *Chief Financial Officer Act* financial auditors.
- Timely, transparent, and appropriate communication of governance-related information to the Field Office Manager (FOM).
- Clearly defined, integrated baseline performance expectations.
- Coordination with the field office to review DOE directives and recommend revisions to the Office of the Administrator.
- Identifying and notifying the field office of best practices that may improve the Site Governance System.

- Sharing lessons learned from accidents and near-miss events, and incorporating them into projects, programs, or day-to-day operations.

Corporate Assurance.

The contractor parents bring a breadth of experience that could benefit the site. To the extent required by the contract, each corporate parent company is expected to monitor and support the contractor partner in ensuring it can continue to meet the expectations of the Government. In light of the corporate performance guarantees contained in the contracts, it is beneficial for the corporate organization to quickly address management or leadership issues within the contractor organization. The corporate parent lead (Board of Director Chairman or equivalent) should have periodic and on-going communication with the Administrator and Principal Deputy Administrator regarding site status and issues. The contractor corporate board should also meet periodically with the FOM on how the contractor leadership team is working with the federal team (both at the site and at HQ).

Attributes of an effective corporate assurance system include:

- Monitoring and evaluating site metrics and performance goals relative to the contract and benchmarking.
- Support for staffing shortages, staff development, and retention programs to cultivate the workforce of the future.
- Periodic evaluation and corporate functional input of the site contractor organizational structure and leadership team effectiveness (e.g., engagement, cohesion, working relationship with field office and HQ).
- On-going dialog with the Administrator, Principal Deputy Administrator, FOM, other senior HQ management, and key stakeholders.

Federal Oversight.

The federal oversight team consists of three entities: programmatic elements, functional elements, and field offices. HQ functional leads, in conjunction with the FOM, perform oversight in key functional areas as shown in Table 1. Depending on the particular site and its hazards, key functional areas (identified with an asterisk [*]) may pose higher risk to the mission, gain increased public attention when upsets occur, or pose greater risks to the public or the environment. For those functional areas that are designated with an asterisk (*), responsibility for performance is shared between the HQ functional organizations and the field office. In other functional areas (e.g., day-to-day operations; environment, safety and health (ES&H); quality; and business and contract management) responsibility resides primarily with the field office, leveraging functional and programmatic resources as appropriate to ensure contractual compliance and effective performance. NNSA field, program, and functional offices collaborate to resolve issues that could challenge mission delivery.

Table 1 - NNSA Field Office Oversight Functional Areas

Field Oversight Functional Areas
High Hazard Operations, including Nuclear Safety*
Safeguards and Security*
Cybersecurity*
Emergency Management*
ES&H (other than high hazard operations) and Quality
Day-to-day Operations/Maintenance
Business and Contract Management

Note: Functional areas marked with “*” are given higher priority and greater emphasis due to their increased potential for mission impact.

Attributes of an effective federal oversight system include:

- High-risk activities and areas with significant performance weaknesses are evaluated to determine the necessary activity-specific oversight.
- Experienced and qualified FOMs and senior leadership have a good rapport with, and trust, the contractor senior leadership and HQ elements.
- HQ elements meet regularly with their counterparts, and periodically as a group, to discuss site mission performance.
- Field office support promotes programmatic communications between the contractor and program managers.
- Federal team elements promptly communicate emergent issues that could adversely affect mission delivery and collaborate to develop optimal responses.
- Qualified technical staff, especially in key or unique functional areas (e.g., CORs, facility representatives, subject matter experts).
- Level and type of oversight activities are graded based on potential to adversely affect site mission performance.
- Flexible, integrated assessments that leverage the contractor site-level governance system activities wherever possible.
- Positive recognition and reinforcement when contractor partner self-identifies site problem areas.
- Periodic (e.g., weekly) integrated field office meetings to discuss closure of existing issues and emerging trends and potential new issues. HQ programmatic and functional offices examine performance trends across the sites.

- A site-level issues management system to identify and track issues to closure.
- Factual, timely, and appropriately detailed information that flows to and from the HQ program offices, functional managers, Office of the Administrator, and the FOMs, Contracting Officers, and Contracting Officer's Representatives to ensure a focus on speaking with *one voice*.
- Clearly defined roles and responsibilities between the FOM, program office, and functional office with well-defined, contractually enforceable federal direction given only by the CO or the appointed CORs.
- Value-added and timely Government feedback to the contractor partners, with an objective to improve safe, secure, and efficient mission performance.
- Frequent informal interaction between field office and the contractor partner senior management, where performance feedback on site mission reliability is discussed.
- Periodic, formal feedback provided to the contractor partner at the systems-level [e.g., for noted site program weaknesses that are not being sufficiently addressed by contractor's assurance system(s)].
- Field office oversight activities focused on systems-level performance.
- NNSA federal graded approach for compliance-based assessments required by DOE Orders performed by HQ functional support as requested by the FOM. FOM has the lead responsibility for contractor partner interactions, including audit schedules, findings, and required corrective actions.
- Clearly defined baseline performance expectations.
- Direct and routine engagement by HQ programmatic and functional leadership with the FOM, CO, and CORs to discuss performance highlights and concerns in order to foster the one voice expectation for performance feedback to the contractor partners.
- Where appropriate, shared lessons learned from accidents and near-miss events with the sites and HQ offices.

APPENDIX A: FIELD OFFICE PROGRAM LIAISON

Federal Program Managers (PMs) lead the governmental elements of National Nuclear Security Administration (NNSA) programs. The PMs define requirements and authorize funding through the respective field offices for execution by the Management and Operating (M&O) partners. At the field office, the Contracting Officers authorize the scope and funding of NNSA programs. The field office program liaisons (PLs) interact with PMs, functional managers (FMs), and M&O partners on a routine basis to support the safe and efficient execution of NNSA programs.

1. PURPOSE. The field office PLs support the PMs and Field Office Managers (FOMs) by on-site monitoring of M&O partner's mission performance. This appendix describes the PL's roles and responsibilities within that context.
2. BACKGROUND. The federal oversight team consists of three entities: programmatic elements, functional elements, and field offices. The overall role of the PL is to promote integration between NNSA and M&O partner organizations, and between the various NNSA organizations. The PL is also expected to communicate, resolve, or mediate issues and enable successful mission execution. To successfully perform this role, PLs are responsible for four pillars: Operational Awareness, Monitoring, Integration, and Evaluation.
 - a. Operational Awareness - maintaining an understanding of program scope, relationships, site resources and capabilities necessary to support program activities, and associated risks (e.g., safeguards and security; environment, safety, and health; emergency management, and nuclear operations) for successful accomplishment of program objectives. Program awareness is not program management; rather, it is becoming familiar with program activities.
 - b. Monitoring - assuring that work is being performed in accordance with documented contract objectives and programmatic goals. Monitoring supports the identification of potential site issues or concerns that may affect the ability to complete contract and program objectives. PLs monitoring supports the FOMs in meeting their line management responsibilities for operations at their respective sites, and also supports the PMs with their oversight responsibilities. The focus of the monitoring is to identify, prevent, and assist in resolving mission impacting issues.
 - c. Integration - synthesizing and communicating information obtained from program monitoring by PMs, PLs, and field office subject matter experts to ensure the success of the program activity. The PL is key to reducing and eliminating hurdles and barriers to achieve NNSA's missions. For example, a PM may need a field office assessment rescheduled to minimize the impact on an important mission activity, or an M&O partner organization may request assistance moving a purchase order through the field office contracts group. In addition, there are multiple external interfaces that require an integration aspect such as interfacing with PLs at other field offices and Department of Defense customers (e.g., during on-site tours). While the PL builds a relationship with these external groups, it is

always done with the recognition that the PMs have the primary role in managing the program and PL engagement is only done to assist the PM or FOM in achieving program objectives. The PL cannot change the scope of the PM requirements for the program.

- d. Evaluation - coordinating the development of the contract Performance Evaluation Measurement Plan (PEMP) and the overall performance assessment for program-related objectives, measures, and targets performed by PMs, PLs, FOMs, and FMs. The PMs are responsible for performance of their respective program(s). FOMs are responsible for performance of the M&O contractor. The two entities partner to evaluate and influence the M&O contractor's performance through contract tools, such as Letters of Direction, interim feedback, and Annual Performance Evaluation Reports, and oversight and assessment reports.

3. RESPONSIBILITIES.

a. Program Liaisons.

- (1) Maintain program awareness of site cost, scope, schedule, and issue resolution for Department of Energy (DOE), NNSA, strategic partnership projects, and strategic intelligence partnership projects (SIPPs) PMs to the project level.
- (2) Maintain program awareness by understanding program relationships, site resources, and capabilities necessary to support program activities and associated risks.
- (3) Develop a network of relationships with three groups: 1) the PMs, 2) the M&O partner organizations, and 3) headquarters (HQ) functional managers (FMs) as appropriate. These relationships are based on building trust and respect in, and mutual understanding of, each organization's roles and responsibilities.
- (4) Attend meetings and build relationships with M&O partner program and project leads and field office mission support groups, including ES&H, nuclear operations, and facility representatives is essential to identifying and resolving issues that could affect mission performance.
- (5) Possess basic knowledge of safety, nuclear safety, security, environment, business and contract requirements paired with program knowledge to facilitate onsite issue resolution (through field office, M&O partner, or HQ).
- (6) Serve as an interface to promote conflict resolution when projects or programs executed by multiple contractors have disagreements or conflicting requirements or priorities.

- (7) Communicate competing program priorities at the site to the appropriate program sponsors and the FOM for resolution (competing priorities at the site level between programs, e.g., Defense Programs [NA-10] versus Defense Nuclear Nonproliferation [NA-20]).
- (8) Monitor program performance status, milestones, and other targets as defined in implementation plans, program execution plans, and communicate potential performance issues to the appropriate Contracting Officer's Representative, PM, and field office management. Notify the Contracting Officer of any issues or actions that may affect or alter the terms and conditions of the contract.
- (9) Participate in contract performance evaluation reviews with both PMs and field office management (quarterly program reviews, etc.)
- (10) Collect program and functional management data for the programmatic input into performance evaluation reporting and validate the information reported.
- (11) Contribute to, or write, initial draft input for the programmatic performance objectives and coordinate input with HQ program.
- (12) Serve on behalf of the FOM and the PM as the program representative on tours.
- (13) Review, on behalf of the FOM, data calls specific to assigned programs for the field office (e.g., *Stockpile Stewardship and Management Plan*, lab planning, reports to Congress).
- (14) Assist the FOM by ensuring program input is considered on responses to external inquiries at the site level (e.g., Defense Nuclear Facility Safety Board, Inspector General, Government Accountability Office).
- (15) Serve as the lead on local directives specific to program implementation.
- (16) Provide input for nuclear startups and high hazard operations.
- (17) Review M&O partner input and develop field office input for HQ program reviews, integrated budget reviews, etc.
- (18) Review programmatic implementation plans to understand what work is expected from the M&O partner for a specific period of time, including programmatic milestones.

- (19) Review for the field office and with PM, University Collaboration bids, Tech Transfer, Cooperative Research and Development Agreements, Intellectual Property & Patent Agreements, Inter-Agency Agreements, Memoranda of Understanding, Memoranda of Agreements.
- (20) Perform and document oversight (operational awareness of assigned projects; ensure findings are entered into issue tracking system, as necessary).
- (21) Support the PMs, as well as inform the FOM of the operational risks. Ensure program and functional offices receive notification of significant decisions and events.
- (22) Provide interim or year-end M&O contractor performance input to HQ program office senior management, as deemed necessary.

b. Headquarters Program Organizations.

- (1) Provide to the FOM interim or year-end performance input on the PLs in their respective program specific to that performance period, as deemed necessary.
- (2) Ensure work is in accordance with documented contract objectives with enabling organization and field office subject matter experts.
- (3) Maintain the primary role in managing the program. PL engagement is only done to assist either the PM or FOM in achieving program objectives.

APPENDIX B: SAFETY MANAGEMENT PROGRAM REVIEWS

1. **PURPOSE.** This appendix outlines the responsibilities and processes for identifying, coordinating, and conducting requirements-driven safety management program (SMP) reviews using assistance from the Office of Safety, Infrastructure, and Operations (NA-50). Under NA-50, the mission for the Deputy Associate Administrator for Safety (NA-51) is to support the effective development and consistent implementation of safety programs and requirements across the National Nuclear Security Administration (NNSA). Through mutual efforts and support, both the Field Office Managers (FOMs) and NA-50 will achieve improved operational awareness of safety management programs.
2. **BACKGROUND.** Reviews of all SMPs credited in the documented safety analysis (DSA) of hazard category 2 and 3 facilities should occur at least once every 5 years. In some cases, SMP-specific requirements necessitate review more frequently (e.g., once every 3 years). Although the major focus of DOE O 226.1B, *Implementation of DOE Oversight Policy*, is on hazard category 2 and 3 nuclear facility SMPs, the principles of a review of DSA-credited and uncredited SMPs should be consistent.

The SMP reviews provide credible, objective, and value-added information to line managers on the safety management program's overall health and its ability to meet requirements. The process in this appendix will:

- Meet the requirements of DOE O 226.1B for reviews of contractor safety management programs at nuclear and non-nuclear facilities.
- Reduce the field office staffing burden for requirement-driven reviews and allow field office technical safety staff to focus on performance-based oversight activities.
- Drive consistency across DOE O 226.1B required reviews, including implementing consistent definitions, review criteria, goals, and oversight responsibilities for SMPs.
- Drive continuous improvement to safety management programs through sharing of lessons learned, trending, and implementation of metrics to evaluate overall program health.

3. **RESPONSIBILITIES.**

- a. **Field Office Managers (FOMs).**

- (1) Maintain accountability and oversight responsibility for the health and performance of safety management programs through requirements- and performance-based reviews.

- (2) Set the risk level and the corresponding level of review effort. Communicate this information to NA-50.
 - (3) Identify, with assistance from NA-50, SMP reviews planned for the fiscal year and associated requests for NA-50 resource support in the Site Integrated Assessment Plan (SIAP). Appendix C provides attributes of the SIAP.
 - (4) Identify which reviews need NA-50 assistance as team leads or team members.
 - (5) Identify site priorities to be covered by the SMP review.
 - (6) Review and approve the review plan developed by the team lead.
 - (7) Maintain control and closeout responsibility for issues identified in the reviews.
 - (8) Provide field office resources (e.g., personnel, documents, workspace) to support the scope of the review.
- b. Associate Administrator for Safety, Infrastructure, and Operations (NA-50).
- (1) Coordinates with the FOMs to schedule and identify technical resource support for DOE O 226.1B requirements-based SMP reviews.
 - (2) Maintains operational awareness of contractor SMPs performance and health at field offices on behalf of the Administrator.
 - (3) Drives continuous improvement to SMPs through sharing of lessons learned, trending, and implementation of metrics to evaluate the overall program health.
- c. SMP Review Team Lead.
- (1) Leads and manages the review team on behalf of the FOM. (The team lead may be a member of the field office or external staff.)
 - (2) Selects team members with field office input.
 - (3) Tailors the review objectives and Criteria Review and Approach Documents (CRADs), as needed.
 - (4) Develops the review plan and provides a copy to the team members for field office approval.

- (5) Ensures the quality and timeliness of the final report.
- (6) Communicates the report results to the field office prior to broader distribution or use in NNSA analysis.
- (7) Provides post-review support to the field office, when requested and as available, to work federal or contractor corrective measures.
- (8) Defers concerns with issue characterization to the field office if SMP reviews are being done on behalf of the Field Office Manager.

d. SMP Review Team Member.

- (1) Reviews the appropriate directives, standards, statutes, regulations, industry standards, and best practices for the chosen SMP.
- (2) Defines, acquires, and reviews the field office and contractor implementing documents using the CRADs developed for the review.
- (3) Works closely with their assigned federal and contractor counterparts to effectively communicate potential issues and areas for improvement.
- (4) Conducts the review according to the field office review practice or procedure, where applicable.
- (5) Prepares the review write-up for their assigned area.

4. PROCESS.

a. Prioritization and Selection of the SMPs.

- (1) Field offices use the SIAP to identify and plan for staffing of their annual requirement- and performance-based reviews.
- (2) For best consideration of NA-50 resources, first drafts of SIAPs with identified resource requests should be submitted to the Deputy Associate Administrator for Safety (NA-51) by August 1. It is understood by NA-50 that what is submitted on August 1 may not be the full representation of reviews to be conducted, as needs arise throughout the year. For requests not submitted by August 1, the resource needs will be assessed against the resources available and assigned personnel on an ad hoc basis.
- (3) From the field office SIAP inputs, NA-51 will develop a consolidated, prioritized schedule for performing or participating on field office reviews.

NA-51 office directors will compare the schedule and resources requested against their staff availability. Discussions regarding scheduling, broad scope, unavailability of resources, or other conflicts will occur between the NA-51 office directors and the field offices from August 1 through September 1. A draft schedule with resources assigned will be sent to the field offices no later than September 2.

- (4) In the event that not all field office requests can be fulfilled with NA-50 resources, NA-50 will attempt to arrange for other field office or Department of Energy (DOE) resources. In addition to meeting resource requests, this practice promotes cross-site learning.
- (5) If resources cannot be made available, NA-50 and each Field Office Manager will prioritize competing field office requests considering mission impact, regulatory requirements, or other safety requirements.

b. Scope of Reviews.

- (1) A review of SMPs credited in the documented safety analysis for hazard category 2 and 3 facilities should occur at least once every 5 years per DOE Guide 226.1-2A, *Federal Line Management Oversight of Department of Energy Nuclear Facilities*. In some cases, other SMP-specific requirements necessitate a review more frequently. SMPs that are applicable to this approach include:
 - i. Criticality Safety
 - ii. Radiation Protection
 - iii. Maintenance
 - iv. Procedures
 - v. Training
 - vi. Conduct of Operations
 - vii. Quality Assurance
 - viii. Waste Management
 - ix. Worker Safety & Health
 - x. Hazardous Material Protection
 - xi. Decontamination and Decommissioning
 - xii. Fire Protection
 - xiii. Safety Basis Program (and Unreviewed Safety Questions)

- (2) SMPs not included as part of the DSA, but that should be considered for this SMP approach, include:
 - i. Chronic Beryllium Disease Prevention Program (CBDPP),
 - ii. Integrated Safety Management, and
 - iii. Safety Culture.
- (3) The graded approach will be applied to all SMP reviews. The level at which reviews are conducted will depend on the risk of the program and other factors deemed appropriate by the field office and NA-50. The level of review that should be considered includes one person or team desktop documentation review; onsite one-person review; onsite team review; or a combination of the previous items; and participation in, or observation of, a contractor review.
- (4) For reviews that follow this approach, standard CRADs, if available and appropriate for the type of review, will be used. The CRADs will not be exclusive and the team lead will work with the field office to determine if site-specific criteria needs to be included. The CRADs are meant to be a starting point from which the review plan can take shape.
- (5) Generally, the site-specific review, or review procedure, should be used to guide the team leader in conducting the review.
- (6) Following completion of the review, it is expected that team leads provide, if requested, assistance in post-review support. This post-review support may include the development of corrective action plans, follow-on actions related to the contractor, or other field office needs. NA-50 management and field office management should discuss resource conflicts for post-review support.

c. Team Composition.

- (1) The team will be composed of a team leader and may include additional team members. The team lead can be selected from either the field office staff or NA-50.
- (2) The scope of the review determines the number of team members.
- (3) The team members should be a mix of field office and headquarters personnel. Consideration should be given to include other field office and DOE (e.g., Enterprise Assessment, Office of Science) expertise as needed. The team members are selected based on their expertise as it relates to the SMP being assessed.

- (4) Less experienced personnel should be considered, where appropriate, to foster mentoring opportunities.

d. Review Plan.

- (1) The review plan documents for team members, and for the organization being assessed, the specifics of the team, scope of the review, review approach, team points of contact, and any other pertinent information that would aid in focusing the review for the reviewer and for the organization.
- (2) The review plan can be developed using the graded approach with more detail included for complex reviews and less detail for less complex reviews. The following topics should be considered for inclusion in the review plan:
 - i. Purpose/Objective - A description of why the review is being conducted.
 - ii. Scope - A description of the scope of the review and what requirements are the bases for the review.
 - iii. Team Members - A table with the team members including name, organization, and review responsibility.
 - iv. Schedule - A review schedule with dates for the review, draft report, factual accuracy, and final report should be included. If possible, interviews and tours should also be identified.
 - v. Issue Characterization - How issues will be characterized should be defined. If the review team lead will be using a site-specific procedure it should be identified here.
 - vi. Review Criteria - Criteria Review and Approach Documents with Lines of Inquiry, if appropriate.

e. Logistics and Training.

- (1) Prior to beginning the review, the team members are expected to complete all site-specific training and access requirements. To assist in reducing the burden on the field offices and to ensure all team members have the appropriate training and site requirements, NA-50 should consider aligning reviews with team members who already have site-specific training and access requirements. For those that do not have site-specific training and access, consider assigning them a site to work more frequently.
- (2) Contractor counterparts should be identified early in the planning process so they are prepared to effectively support the review team.

- (3) CRADs and the review plan should be approved by the field office and distributed no later than 2 weeks prior to beginning the review, even if only a paper review.
- (4) A schedule of interviews should be released no later than 1 week prior to the review.

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APPENDIX C: SITE INTEGRATED ASSESSMENT PLANS

1. **PURPOSE.** This appendix provides guidance to assist National Nuclear Security Administration (NNSA) field offices and Headquarters (HQ) elements in the annual development, updating, coordinating, and reporting of Site Integrated Assessment Plans (SIAPs) within the sites and across the enterprise as required in Section 7.b (2) of this Supplemental Directive. The iterative planning process results in a comprehensive transparent plan for assessment activities for the fiscal year. SIAPs promote the integration of assessments conducted by organizations external to the field office with those conducted by the field office or site contractors. They are a means for identifying efficiencies by combining similar assessment activities, or eliminating duplicate activities.
2. **BACKGROUND.** Attributes of an effective SIAP include:
 - Timely review and analysis of data (performance, compliance, risk, issues, etc.) from mission and functional databases and field activities associated with oversight actions.
 - Integration, transparency, and collaboration between the field office and the Management and Operating (M&O) contractor partner, and between the field offices and the program and functional offices.
 - Documented assessment activities identifying areas that will require external assessment support and coordination with the contractor and contractor parent organization.
 - Assessment frequency for contractor assessments, self-assessments, and internal assessments.
 - Insights from the Contractor Assurance System (CAS).
 - Standard software application to manage the schedule between the field office and site contractors.
 - Simplified assessment planning process, scheduling, and reporting that increases collaboration within NNSA. Routine communication of plans between the field offices, contractors, and HQ.
 - Configuration control to ensure timely communication of changes to planned activities.
 - Out-year planning assessments.
 - A risk-based approach to help identify and prioritize the oversight focus areas.

3. RESPONSIBILITIES.

a. Field Offices.

- (1) Provide a preliminary draft SIAP to the Associate Administrator for Safety, Infrastructure, and Operations (NA-50), as discussed in Appendix B, to facilitate initial NA-50 coordination of field office requests for Office of Safety (NA-51) assistance.
- (2) Approve the annual SIAP and submit to the functional, program, and project offices. Field offices should consider sharing integrated plans with NNSA external stakeholders, such as Department of Energy (DOE) Inspector General or DOE Enterprise Assessments.
- (3) Perform annual risk-based review of enterprise oversight areas. Function- or site-specific emphasis areas result from any known vulnerabilities or performance weaknesses that pose a high risk to mission execution for the upcoming year.
- (4) Coordinate, monitor, and track assessments with subject matter experts and SIAP point of contact.

b. Functional and Program Offices.

- (1) Engage with field office counterparts, as appropriate, to inform the annual field office SIAP development process and to inform and support any necessary SIAP updates.
- (2) Provide field offices with initial and out-year oversight planning input for each enterprise oversight area for which they are responsible.
- (3) Coordinate with field offices on assessments they want to participate in, support, or provide.

APPENDIX D: DEFINITIONS

- a. Contracting Officer (CO). The person appointed by the Head of the Contracting Activity to award, administer, and close out contracts, based on the limitations and authority of their warrant.
- b. Contracting Officer's Representative (COR). A federal employee designated and authorized, in writing, by the Contracting Officer to perform specific technical or administrative functions.
- c. Contractor Corporate Parent/Contractor Parent. An organization whose subsidiary or affiliated subordinated company has entered into a contract with NNSA.
- d. Federal Oversight System Description. Field oversight establishes the mechanisms for "checks and balances" for contract compliance and creates a healthy questioning attitude that helps minimize complacency in the formality of conducting hazardous operations. The site Federal Oversight System Description describes the processes for evaluating contractor assurance, contractor performance, and federal assessment activities, which help foster continuous improvement in mission execution. Working with the field office, the NNSA functional and program elements augment field office oversight activities, and ensure that the federal oversight perspective is communicated with one voice.
- e. Field Office Manager (FOM). Person appointed by the Administrator to lead a field office.
- f. Functional Manager (FM). Federal functional managers are mission enablers who provide technical assistance or subject matter expertise and resources to enable mission delivery in support of program and field offices to implement delegated responsibilities. The functional manager is the line manager responsible for these NNSA HQ functions:
 - (1) Safety – Nuclear safety requirements and policies defined in DOE O 410.1, *Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements and Environment, Safety, and Health* requirements except nuclear safety requirements defined in DOE O 410.1. (Associate Administrator for Safety, Infrastructure, and Operations; Cognizant Secretarial Officer for Safety, Chief of Defense Nuclear Safety, and Central Technical Authority).
 - (2) Safeguards and Security - all physical security program elements (Chief of Defense Nuclear Security).
 - (3) Cybersecurity program elements (Chief Information Officer).
 - (4) Emergency Management program requirements, as defined in DOE O 151.1D, *Comprehensive Emergency Management System*, (Associate Administrator and Deputy Under Secretary for Emergency Operations).
 - (5) Business Management – business areas of procurement, finance, personal property, small business, contractor human resources, and contract administration (Associate Administrator for Management and Budget)

- g. Governance. The system of management and controls executed in the stewardship of the organization. NNSA implements governance through a collaborative partnership between federal and contractor organizations to accomplish a common mission while still preserving the federal independence needed to function in NNSA's self-regulatory role.
- h. NNSA Site Governance Model. The single, comprehensive governance framework for a site that relies on the unique interrelationship inherent in the NNSA contracting model, corporate parent involvement, and federal oversight. The relationship between the M&O contractor (or prime security contractor or prime environmental management contractor), the corporate parent(s), and the NNSA federal team, is built on trust and transparency to ensure a balanced approach to effective mission accomplishment. Though the federal and contractor organizations collaborate to develop the NNSA Site Governance Model, NNSA preserves its federal independence needed to function in the NNSA's self-regulatory role.
- i. Site Governance System. The system of management assurance and controls executed in the stewardship of the site. A good governance system informs a common understanding of the unique relationship between all entities within the NNSA enterprise requiring the scope of federal oversight be determined based on the demonstrated strength of the contractor's management systems
- j. Governance Peer Review. A process internal to NNSA, whereby teams of contractors (including parent representatives—consistent with the respective contracts) and federal employees (from program, functional, and field offices) gather to assess and provide recommendations on a Site Governance System. The governance peer review process is meant to be collaborative in nature. The team does not approve the Site Governance System. Reviewers may include representatives from other sites, including those that had previously implemented a contractor assurance system.
- k. Performance-Based. An approach where greater emphasis is placed on the performance and risk impact of issues discovered rather than on simply the existence of specific non-compliance issues. Performance-based, systems-level oversight is used to assess contractor performance by evaluating the contractor's processes and management systems and the data normally generated by these systems. In a performance-based approach, the assessor addresses the localized, as well as the broader, impact of the issues against the overall adequacy, efficiency, and cost-effectiveness of what is being assessed.
- l. Program Office. A headquarters organization that is responsible for overseeing appropriated funding and executing program management functions. Programs are national in scope and span multiple NNSA sites. The three core mission pillars within the NNSA are: (1) maintaining a safe, secure, and effective nuclear stockpile; (2) preventing, countering, and responding to the threats of nuclear proliferation and nuclear terrorism; and (3) providing propulsion for the United States nuclear navy. These constitute the main NNSA mission programmatic areas. NNSA Program Offices include Defense Programs (NA-10), Defense Nuclear Nonproliferation (NA-20), Naval Reactors (NA-30), Emergency Operations (NA-40), Safety, Infrastructure and Operations (NA-50), Defense Nuclear Security (NA-70), Counterterrorism and Counterproliferation (NA-80), and Information Management (NA-IM).

- m. Program Liaison (PL). Field office personnel dedicated to facilitating communication between PM and local sites to assist mission performance, in accordance with Appendix A.
- n. Program Manager (PM). An element of DOE line management who is responsible for NNSA program execution. For the purpose of this Supplemental Directive, a Federal Project Director is considered a PM and the authorities for capital construction are designated in BOP 06.05, *Project Management for the Acquisition of Capital Assets* and further delineated in each project execution plan.
- o. Reliable Mission Performance. Performance by the contractor where (1) NNSA mission objectives are met; (2) workers, the public, and the environment are protected; (3) assets are secure; and (4) operational and business systems are managed within contract requirements.
- p. Risk-Informed. A decision-making approach whereby conclusions drawn from an assessment of past performance, hazards involved, and the likelihood and consequences of accidents are considered together with other factors to make decisions that better focus contractor and federal oversight attention on design and operational issues commensurate with their importance to public health and safety.
- q. Systems-Level Oversight. A comprehensive, global oversight of all programmatic and functional activities that assess performance through evaluating the contractors' processes and management systems and the data normally generated by these systems.

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APPENDIX E: REFERENCES

- a. DOE P 226.2, *Policy for Federal Oversight and Contractor Assurance Systems*, dated 8-9-16.
- b. DOE O 226.1B, [Implementation of Department of Energy Oversight Policy](#), dated 4-25-11.
- c. DOE O 227.1A, [Independent Oversight Program](#), dated 12-21-15
- d. DOE O 251.1D, [Departmental Directives Program](#), dated 1-17-17
- e. DOE O 412.1A Admin Change 1, [Work Authorization System](#), dated 5-21-14
- f. DOE O 413.3B Change 5, [Program and Project Management for the Acquisition of Capital Assets](#), dated 4-12-18
- g. DOE O 414.1D Admin Change 1, [Quality Assurance](#), dated 5-8-13
- h. NNSA *Governance & Management Framework*, dated 3-27-2019
- i. NNSA SD 226.1-1A, [Headquarters Biennial Review of Nuclear Safety Performance](#), dated 12-16-11.
- j. NNSA SD 251.1A, *Directives Management*, dated 1-17-18
- k. NNSA SD 450.2A, *Functions, Responsibilities, and Authorities (FRA) for Safety Management*, dated 7-4-18
- l. NNSA SD 412.1, *Work Authorizations*, dated 1-18-17
- m. NNSA Policy (NAP)-33, *Planning, Programming, Budgeting, and Evaluation (PPBE) Process*, dated 1-17-17.
- n. NNSA NAP 413.2, *Program Management Policy*, dated 2-04-2019
- o. NNSA BOP 413.7, *Project Management for the Acquisition of Capital Assets*, dated 8-9-16