



U.S. DEPARTMENT OF
ENERGY

Office of
Science

ARGONNE SITE OFFICE

OVERSIGHT PLAN

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Date

ASO Document Revision History

Title: ASO Oversight Plan

Point of Contact: Rock Aker

SCMS Management System: [Quality Assurance and Oversight](#)

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REVISION	DATE	REASON/DRIVER	DESCRIPTION
0	October 2011	Initial Issue	
1	September 2012	Improvement of ASO CAS	Substantial revision to Enhance CAS coverage for ASO, Continue alignment with SCMS
2	September 2014	Address corrective actions and B-350 assignment to ASO	Revision addresses several outstanding corrective actions and incorporates ASO oversight of B-350 (assigned May 2014)
3	September 2015	Annual Review	Addresses corrective actions, SCMS changes and ASO operating improvements
4	December 2016	Annual Update and transition from ASOACT/ASOISS to the AIM sharepoint tool.	Addresses use of AIM, adds ASO management approval of date changes to ASO led assessments, incorporates new assessment templates, and improved guidance on assessment activities. Removed references to B-350.

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1.0 ASO Oversight Program Objective

The Argonne Site Office (ASO) is the Office of Science's (SC) federal line manager for Department of Energy (DOE) conducted operations at Argonne National Laboratory (Argonne). Such operations are executed by Argonne under a Prime Contract between DOE and UChicago Argonne LLC (UChicago). This Plan represents ASO's implementation of DOE O 226.1B through execution of the Contractor Assurance System (CAS) and the Science Management System (SCMS) Line Management Oversight Program Description (LMOPD).

NOTE:

Effective May 2014, ASO also became the DOE line manager for New Brunswick Laboratory (NBL). NBL was a government (SC) owned, government operated (GOGO) laboratory (Building 350) on the Argonne campus. In May 2016, government mission operations ceased in the building with the formation of the NBL Program Office and the B-350 Transition Office. This plan also addresses the ASO oversight responsibilities for the former New Brunswick Laboratory (B-350). Current plans provide for Argonne assuming responsibility of all operations within B-350 on or about April 1, 2017. At that time, ASO will no longer conduct separate oversight of B-350. Argonne performed activities in B-350 will have oversight consistent with the approach used by ASO for any other Argonne operated building on campus. Once this transition occurs, the specific references within this document to oversight of B-350 will no longer apply.

The ASO Oversight Program is composed of all Federal oversight performed by ASO which satisfies the following primary functions:

- Providing sound direction and fair evaluation of Argonne performance related to the contract;
- Ensuring Argonne and B-350 compliance with applicable requirements;
- Maintaining awareness of site conditions and effectiveness of Argonne and B-350 core processes and laboratory management systems;
- Assessing effectiveness of the Argonne Contractor Assurance System (CAS); and,
- Assessing effectiveness of the ASO Oversight Program.

To achieve these five functions, ASO oversight is comprised of the following principal elements further described in Section 5:

- Evaluation of Argonne and B-350 Performance;
- Review & Approval of Systems and Programs;
- Operational Awareness;
- Assessments;
- Oversight of Contractor Assurance Systems; and,
- ASO Continuous Improvement.

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ASO oversight activities are designed and executed to meet the following guidance provided in March 2013 by the SC Deputy Director for Field Operations (DDFO).

“We are responsible for what I would call a *trust but verify approach* to Contractor Assurance. We have an independent oversight responsibility and must not simply rely on contractor self- assessment to gauge their performance...We, as Federal employees must ensure that the contractors perform their mission safely, securely and efficiently.”

ASO oversight activities are performed by personnel from all four ASO divisions: Environment Safety & Health, Business Management, Infrastructure, Programs & Projects and B-350 Transition Office. These ASO oversight activities collect and assess information from ASO staff activities, as well as Argonne and B-350 systems and operations. The activities are graded in intensity from passive monitoring to active assessment/investigation. A chief determinant of oversight intensity is the maturity of Argonne’s Contractor Assurance System as demonstrated by the quality of CAS, i.e. higher CAS functionality allows generally less intensive ASO oversight. The intensity of B-350 oversight is primarily determined by the observed effectiveness of the B-350 management and oversight programs coupled with operational awareness activities.

The ASO Manager is responsible for ultimate alignment of ASO oversight with DOE and SC goals, while balance, coordination, and prioritization of staff activities are managed by each ASO Division Director.

2.0 ASO Oversight Responsibilities

ASO Senior Leadership Team (ASO Manager, Deputy Manager and Division Directors) – The ASO Manager has DOE line management oversight of Argonne and B-350. The ASO Manager is responsible for ensuring that the summation of Argonne and B-350 programs meet overall contract requirements/expectations. This includes ensuring ASO division activities are balanced and appropriately take into account mission-relevance, programmatic risk, and long-term cost to the Department. The ASO Manager maintains ultimate responsibility for the planning, execution, and quality of ASO’s oversight activities. The ASO Senior Leadership Team provides overall leadership for ASO programs, utilizing oversight results to make decisions regarding Argonne and B-350 performance, allocation of DOE resources, direction of ongoing projects and programs, and resolution of issues or problems identified. The ASO Senior Leadership Team also requests assistance and support from SC’s Integrated Support Center and/or support subcontractors as needed to perform oversight responsibilities.

Business Management Division (BMD) – The BMD includes Contracting Officers, Financial Analysts, Reimbursable Technology Specialists, and Program/Laboratory Management Specialists. The BMD supports the ASO mission to successfully manage and administer the DOE performance-based management and operating contract for the safe, secure, effective and efficient operation of Argonne. From an oversight perspective, the BMD coordinates overall reviews of contractor performance associated with determining if contractual performance requirements have been met. The BMD is also responsible for the oversight of the Laboratory’s

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core processes: business development, contract management, financial management, personnel, real property, human resources, compensation, procurement, Laboratory Directed Research & Development (LDRD) and Strategic Partnership Projects (formerly Work for Others (WFO)). The BMD is also responsible for development and coordination of the Contractor Performance Evaluation Measurement Plan (PEMP).

Environment, Safety and Health Division (ESHD) – The ASO ESHD consists of Facility Representatives (FRs) and various Subject Matter Experts (SMEs). Oversight performed by FRs provides ASO management with accurate objective information on the effectiveness of Argonne and B-350 work performance and practice. This includes implementing an oversight program that focuses resources on selected assessments, operational awareness activities, performance measure monitoring/improvement, and monitoring Argonne and B-350 systems and programs. Their role involves routine presence in Argonne and B-350 facilities and participation in operational awareness activities to ensure the application of ISM core functions to all work. Each ASO FR monitors the work at the assigned facilities to ascertain whether it is properly planned and performed within the approved safety controls. FRs identify and evaluate safety and health issues and concerns, and work with the contractor to diagnose root causes for problems and identify short-term compensatory measures and/or long-term solutions, and follow problem resolution to a satisfactory conclusion.

ASO ESHD has subject matter experts in the major disciplines related to ESH: environment, emergency management, health physics, industrial hygiene, nuclear safety, and occupational safety. Each FR is also an ESH subject matter expert based upon their education and technical expertise. ESHD staff has substantial expertise and experience in one or more functional areas important to ensuring safe operation of Argonne and B-350 facilities. ESHD utilizes a mix of operational awareness and assessments to adequately verify that Argonne and B-350 systems are functional and adequately implemented. ESHD is responsible for oversight of ESH related Argonne and B-350 systems and programs, including: Integrated Safety Management System, Environmental Management System, Worker Safety and Health Program, Radiation Protection Program and Emergency Management Program.

Infrastructure Programs and Projects Division (IPPD) – IPPD includes engineers and physical scientists in the role of Federal Project Director. IPPD executes the lead role within ASO for the safe and efficient conduct of all EM environmental restoration projects, SC line item projects, Infrastructure General Plant Projects (IGPP), Accelerator Improvement Projects (AIP), Excess Facility projects and other projects at Argonne, including those related to energy efficiency and reliability. The IPPD is responsible for DOE oversight of site infrastructure; including facility mission readiness, aspects of real estate management, space banking, and maintenance. The Program/Project Engineers and Managers monitor progress against established schedule milestones and budgets to ensure that each project and assigned program meets ASO's quality objectives. Other oversight roles include ensuring that ESH is built into assigned projects or programs from planning through implementation, performing project status, including: reviewing ongoing physical construction and ESH walkthroughs, and serving as the point of contact with Headquarters Program Managers on project and program status.

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B-350 Transition Office (BTO) – BTO includes various subject matter experts whose responsibility is to plan and execute those actions needed to allow for Argonne to take over all mission execution and mission support of activities within B-350 on or about April 1, 2017.

Delegated Oversight (Safeguards and Security Services) – SC-ISC-CH(SSS) is matrixed to ASO to provide expertise in overseeing Argonne and B-350 programs in areas involving: safeguards and security programs, protection program operations, information security programs, nuclear materials management, classification guidance, nuclear material control and accountability, cyber security, and personnel security. Within ASO, oversight of Safeguards and Security is the responsibility of the ESHD Director, on behalf of the ASO Manager.

3.0 Argonne Site Office Contract Management

The Office of Science expects oversight of its M&O contractors to emphasize partnership between DOE (customer) and the contractor (supplier), with a focus on efficient and effective mission performance. Contract management encompasses tasks or actions not explicit in the Federal Acquisition Regulations (FAR), but that are necessary to carry out the Government’s obligations and commitments under the contract.

Contract management is coordination and monitoring of the regulatory, technical, quality, safety, security, and business outcomes to ensure that the Contractor fulfills the requirements and the terms and conditions of the contract. Such actions are performed by the Contracting Officers, designated Contracting Officer’s Representatives, and other ASO staff. Details on the approach for contract management are found in the [ASO Contract Management Plan](#). This Oversight Plan underpins the ASO Contract Management Plan by implementing coordination and monitoring of operations in order to supply inputs to the evaluation of Argonne performance via the Performance Evaluation and Measurement Plan.

4.0 ASO Approaches to Oversight

SC expectations and principles concerning basic approaches to oversight are defined in Section 3.0 of the [SCMS Line Management Oversight Program](#). ASO emphasizes improved performance driven by contractor accountability, as demonstrated by implementation of management systems and strong Contractor Assurance practices. ASO oversight generally focuses evaluation at the level of core processes and systems performance rather than transactions. However, the intensity of oversight of all Argonne and B-350 activities is based on outcomes of the following core requirements: meeting the Argonne PEMP goals and objectives (or B-350 mission and goal requirements); meeting schedule; cost management; asset management; and compliance with contract requirements and standards, including environmental, safety, health, security, accounting, human resources, property & project management, and other functional areas.

ASO methods and processes for oversight adjust to achieve balance between information-based (document review) and activity-based (walkthrough, surveillance, assessment) oversight. The inputs to this balancing are Argonne and B-350 performance data and information, ASO assessments, Argonne and B-350 assessments (both internal and external), and ASO operational

awareness activities. Risk considerations, performance history, Argonne and B-350 self-assessment data, and regulatory/DOE Directive requirements are factored into oversight focus areas. Adverse performance trends or issues in focus areas make that area a candidate for more frequent and intensive oversight.

SC's operational principles for Assurance Systems are as follows:

- **Line management is accountable for performance.**
- **Assurance is reasonable, not absolute.**
- **Assurance covers the full scope of Laboratory operations.**
- **Assurance is provided by the Contractor.**
- **Assurance is an outcome, not a process.**
- **Effective Assurance is built on mutual trust between DOE and the Contractor.**

ASO considers the Argonne CAS to be effective when:

- CAS drives improvements;
- CAS self-identifies, corrects, and prevents issues;
- CAS operational awareness demonstrates effectiveness;
- CAS third party/independent reviews demonstrate effectiveness of systems and processes;
- Contractor performance metrics demonstrate acceptable levels of performance and/or consistent improvement in performance;
- A climate of mutual trust, honesty, and accountability is built and maintained among all three parties (ASO, Argonne and UChicago Argonne, LLC) as described in the partnership agreement.

Hallmarks of strong CAS exhibit mutual trust, honesty, and accountability while also including: (1) timely and transparent disclosure of systems' performance, issues, conditions, assessments, and events; and (2) risk is identified and mitigated, resulting in improved Argonne programs and operations; (3) clearly defined pathways promote honest communication between the ASO and Argonne counterparts and management. Also, ASO considers UChicago's productive engagement and oversight to be a key feature of a robust CAS. The specific requirements for a CAS are contained in Clause H.42 of the Argonne Prime contract.

5.0 Oversight Elements

ASO utilizes a wide variety of activities to carry out its oversight responsibilities in accordance with the SCMS LMOPD §5.1. These activities are established to DOE O 226.1B requirements applicable to ASO (Clause H.42 is an approved DOE O 226.1 equivalency for Argonne). DOE O 226.1B continues to fully apply to B-350 and ASO. The activities include:

- Evaluation of Argonne and B-350 performance;
- Review and approval of required Argonne and B-350 core processes, systems, plans, and other submissions;

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- Operational awareness;
- Assessments; and,
- Oversight of the Argonne CAS and B-350 Management Systems.

The relative mix of each oversight activity and the number of each activity performed by ASO varies from year-to-year and even within a year depending upon Argonne and B-350 performance, DOE and SC areas of performance emphasis, risk to mission, trends, and other factors. Details on performance of oversight are specifically found in ASO's Standard Operating Procedures (SOPs).

5.1 Evaluation of Argonne Performance

Formal contract performance evaluations of Argonne are conducted throughout the year utilizing the Performance Evaluation and Measurement Plan (PEMP). Prior to each Fiscal Year (FY), SC's Office of Laboratory Policy & Evaluation (OLPE, SC-32), issues guidance for PEMP development. ASO, in conjunction with sponsoring DOE program offices and SC elements, prepares the PEMP in accordance with established annual guidance. The PEMP formally establishes outcome-based mission and overall Laboratory management performance goals, objectives, and notable outcomes in the two major areas of Science & Technology and Operations. Argonne's performance is formally evaluated by both ASO and HQ personnel against Notable Outcomes (performance targets) set forth in each PEMP goal as well as other performance indicators.

ASO meets with Argonne periodically to present performance feedback and at the end of each FY, ASO (with HQ input) prepares a report covering the entire fiscal year. The report is formally presented to the SC Fee Determining Official and staff at SC Headquarters (HQ) for formal fee determination and subsequently forwarded to the Contractor. Information obtained from ASO oversight activities is a vital source to evaluate contractor performance. Argonne's abilities to self-identify, correct, and improve performance, as well as report information to ASO, are taken into consideration in the evaluation process.

5.2 Review and Approval of Systems and Programs

ASO formally reviews and when appropriate, approves or recommends approval by the DDFO of Argonne systems, plans, and submissions to ensure compliance with laws, executive orders, regulations, policy issuances and procedures, and to protect the government interests. ASO authorities are assigned by DOE Directive, or are formally delegated by the Office of Science and captured within SCMS.

Examples of Argonne submissions as applicable to ASO include, but are not limited to:

- Documented Safety Analyses for \geq HC 3 Nuclear Facilities
- Technical Safety Requirements for \geq HC 3 Nuclear Facilities
- Unreviewed Safety Question Procedure for \geq HC 3 Nuclear Facilities
- Quality Assurance Program Plan

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- Quality Assurance Plans for \geq HC 3 Nuclear Facilities
- Worker Safety and Health Program
- Radiation Protection Program
- Accelerator Safety Envelope
- Environmental Management System
- NEPA Environmental Review Determinations
- Site Sustainability Plan
- Integrated Safeguards & Security Plan
- Cybersecurity Plan
- Comprehensive Emergency Management Plan
- Emergency Management Hazard Surveys/ Hazard Assessments
- Contractor Assurance System Description
- Integrated Safety Management System Description
- Work-for-Others Proposals
- Procurement System
- Property Management
- Compensation System
- Human Resources and Key Personnel Actions
- Project Management Documents

Depending on the requirement, ASO staff formally performs a thorough review of annual reports, documents, updates, and major changes and recommends approval, when appropriate. Information gathered from review of Argonne and B-350 program documentation and periodic reports is a major source of information for assuring and evaluating contractor and B-350 performance.

5.3 Operational Awareness

Operational awareness is the result of direct interactions of ASO staff with Argonne and B-350 operations personnel via meetings, routine interactions, walkthroughs, surveillances, observations and incident/occurrence follow-up. Successful operational awareness requires free, bi-directional flow of information between ASO and Argonne/B-350, enabled by a common understanding of significance and mutual needs. Operational Awareness activities provide insight into emerging risks, issues, and/or changes in management priorities and topical focus within Argonne and B-350. Through operational awareness activities ASO evaluates: efficiency and effectiveness of Argonne and B-350 operations; long-term protection and safety of the public and site workers; protection of the environment; and that DOE assets and resources are maintained and protected.

Operational awareness consists of the routine interactions between ASO, Argonne and B-350 that enable ASO to determine how well Argonne performance meets the requirements of the contract and the determination of effectiveness of B-350 management systems. ASO conducts oversight that validates outcomes from Argonne and B-350 self-assessments, third-party assessments, Contractor metrics, benchmarking, etc. ASO operational awareness activities are typically documented using a graded approach in written notes, minutes from meetings, and entries into ASO databases (typically ASOAIM). Identified issues and weaknesses are resolved through: discussion with appropriate levels of ASO, referral to another ASO SME, feedback to Argonne or B-350 management and staff, technical direction letters, corrective actions, and/or inclusion in the PEMP (or APP) evaluation remarks. Problematic systems, program or subject

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areas identified, as well as higher risk activities, can receive higher focus within ASO's oversight activities.

Operational awareness activities provide a basis for comprehensive monitoring of contractor operations and performance, including: the planning, implementation, and evaluation of work and work control processes; and the implementation and effectiveness of the Argonne and B-350 systems. Implementation of Argonne and B-350 core process and systems is verified by ASO staff through routine interaction and review of information gathered from each discipline or program. This review helps ensure that Argonne programs and systems are flourishing and effective. A list of elements and a brief description of each of these activities follows:

Argonne Meetings – The ASO Manager & Deputy Manager typically meet weekly with Argonne Senior Management (Director/Deputy Directors) to discuss Contractor performance and any potential issues of significance. Periodic management reviews are conducted as part of the PEMP feedback process. Counterparts may meet on a more or less frequent basis to discuss and address issues pertaining to laboratory performance. ASO conducts routine issues management meetings with Argonne division and staff. Observations from Argonne meetings provide ASO personnel with two principal opportunities: to gather information and to evaluate the adequacy of Argonne processes, e.g. on upcoming activities, examine contractor practices, and scrutinize overall work planning and execution and communications processes. Specific meetings, where observations may be warranted include division meetings, pre-job briefings, and experiment safety reviews, Argonne and division committee meetings, project status review meetings, work planning and control meetings, incident investigations and post-work evaluations. Routine meetings with the contractor to discuss results from ASO oversight activities provide a valuable opportunity to exchange information, discuss issues, and agree on resolution of findings, concerns, and observations.

Additionally, UChicago senior leadership meets periodically with the ASO Manager and at least annually ASO's Manager and Deputy Manager participate in a Strategic Partner Retreat that includes UChicago's Vice President of Research, the Argonne Laboratory Director and the Argonne Deputy Laboratory Directors.

Ongoing Peer Interactions – ASO principally relies upon ongoing interaction with counterparts to maintain awareness of daily operations. Informal discussions/meetings, electronic mail and phone calls requesting information, and reading of web pages are used to quickly learn of activities not readily communicated by the other means listed above. Information from ongoing interactions is used to substantiate successful program implementation, issues, contract performance, or other items that may need to be elevated to ASO management.

Walkthroughs, Observations and Facility Tours – Walkthrough activities are a key component of ASO operational awareness activities and oversight. Information gathered from walkthroughs and observations are typically captured in ASO databases (typically ASOAIM) and qualitatively analyzed for trends on a periodic basis. The results of this analysis

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may warrant further resolution with Argonne or B-350 as applicable, or are incorporated into the PEMP feedback provided to the Contractor (Argonne). Activities involve observation of conditions where work is being performed, interacting with contractor personnel responsible for performing the work, and observing activities in progress. Walkthroughs and observations are generally unstructured oversight activities that spot-check appropriate work controls, and may focus on specific functional areas or disciplines, work authorization and control documentation, hazard controls, concerns of the workers, the workers' knowledge of hazards associated with their work, etc. ASO ESHD performs the majority of walkthroughs; however, IPPD and BMD staffs also perform walkthroughs of facilities for projects or reviews. The frequency is flexible and generally based on the level of hazard, risk to mission, and/or other high visibility operations.

Incident and Occurrence Follow-up – ASO monitors the Argonne or B-350 response and management of incidents and occurrences, including investigations, causal analysis and follow-up. Monitoring may range in intensity from reviewing Argonne or B-350 actions to participating in Argonne or B-350 investigations, and when required, advising the ASO Manager that DOE investigation is required. Argonne also develops performance analysis reports to identify trends to enable management to take appropriate mitigating actions. The reports are distributed to ASO for information and follow-up.

5.4 Assessments

ASO uses a risk-based assessment approach in planning oversight to develop an Integrated Assessment Schedule (IAS) designed to minimize overlaps of assessments and promote cooperative assessments while addressing high risk areas. Risk is qualitatively determined by considering Argonne or B-350 self-assessment activities, third party assessments and routine ASO operational awareness. The ASO IAS takes into account the Argonne and B-350 IAS and known HQ reviews. Joint or collaborative reviews with Argonne and B-350 will be performed to promote collaboration. All assessment activities are performed to meet the specifications within applicable SCMS procedures.

The following types of assessments are typical:

ASO Functional Area Reviews (FARs) are in-depth assessments of Argonne or B-350 programs and operations performed/led by ASO employees or performed by others on ASO's behalf to verify the adequacy of management systems and compliance of Argonne or B-350 operations with stated requirements. These reviews may either have team members fully independent of Argonne or B-350, or may be a joint review with Argonne or B-350 personnel in which the ASO member is the team leader. These activities may be performed by the ASO in any functional area, including Quality Assurance, Budget, Business Management, ES&H, Security, Infrastructure, Project Management, and Facilities, as appropriate. The objective of a Functional Area Review is to determine the effectiveness of specific programs across the Laboratory and to identify programmatic weaknesses before they become significant issues. ASO may also perform "for cause" reviews to evaluate programs or areas where weaknesses have

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resulted in poor performance of systems, inefficient operations, or occurrences and incidents. ASO utilizes resources from SC's Integrated Support Center, Headquarters and other Site Offices as necessary in performing FARs.

ASO Observation/Participation in Argonne or B-350 Assessments/Surveillances are laboratory conducted assessments or surveillances in which an ASO SME participates as either a team member or observer. Oversight activities as a participant or observer are addressed in SCMS guidance and applicable ASO SOP(s).

Readiness reviews and assessments (RAs) are formal evaluations of operations, activities, or facilities before start-up or restart to determine whether they can be conducted safely, as prescribed by 10 CFR 830 and DOE Order 420.2C. RAs are performed on new operations, activities, or facilities, and those that were suspended for reasons relating to operational safety. ASO personnel may observe readiness reviews performed by the contractor, or may participate as members of DOE teams assigned to independently validate contractor reviews, as long as they have had no involvement in preparing the facility, personnel or procedures being reviewed. Readiness reviews and assessments may require review of authorization basis documents, operational procedures, program documents, and special safety program documents. These efforts may also entail observation of work activities, evaluation of personnel training and qualification, walk-downs of systems and equipment, and interviews with personnel.

External Assessment – DOE HQ performs assessments or reviews that are to be coordinated through ASO. External assessments are also performed by organizations outside of ASO, such as the Illinois Environmental Protection Agency (IEPA), US EPA and other third parties. External certification audits to the ISO9001 and ISO14001 standards are completed by an International Organization for Standardization (ISO) registrar. Argonne and B-350 arranged third-party assessments are evaluated by ASO for value and depth of coverage and are utilized as an important component of ASO's oversight program and therefore included within ASO's IAS.

Surveillances – Surveillances are less formal oversight activities that involve observation of specific work planning and work activities to evaluate the specific work being conducted. Surveillances evaluate worker implementation of the Argonne or B-350 requirements and compliance with DOE requirements and standards. Surveillances focus on specific work activities and evaluate adequacy of personnel training and qualification, adequacy of and adherence to administrative controls, effectiveness of engineering controls, effectiveness of specific Argonne or B-350 programs, and overall performance. The results of surveillances may be folded into ASO feedback on Argonne or B-350 operations at a level corresponding to the significance of the observations, i.e. from peer level to PEMP (or APP). Summary results are always shared with Argonne or B-350 counterparts.

ASO reviews the extent and effectiveness of Argonne's and B-350's corrective action systems in responding to internal (self-assessments) or external assessments (third-party or federal

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oversight). ASO has access to the Argonne IMTS and DOE systems (ORPS, NTS, etc.) to verify completion of corrective actions. As the Argonne CAS matures, the vision is for ASO to focus less on the specific validation of corrective action closure and focus more directly on system effectiveness. ASO has access to B-350's corrective action systems (PROQUIS, ePegasus and ORPS) for similar oversight activities. ASO also provides feedback to Argonne and B-350 as appropriate during development of causal analysis and corrective action. For DOE (non-B-350) led assessments, ASO approves corrective action plans and verifies closure of findings.

5.5 Oversight of Argonne CAS Management Systems

ASO determines the effectiveness of Argonne's CAS management systems by evaluating various elements, including:

- frequency, breadth, and depth of the internal independent assessments;
- rigor of line management self-assessments;
- frequency, breadth and depth of third party audits, peer reviews, independent assessments, and external certification/accreditation to national/international management system consensus standards [e.g. ISO 9001, ISO 14001];
- use of Argonne initiated performance measures and lessons learned;
- Argonne oversight personnel and SME technical expertise and qualifications;
- number and severity of findings identified by CAS and those cited by external assessments;
- Argonne's demonstrated success in self-identifying and correcting problems;
- effectiveness of completed corrective actions as determined by Argonne or ASO;
- existence of rigorous and well-documented programs; and
- sustained management support for the Contractor Assurance System.

Annually, ASO reviews the Argonne CAS effectiveness determination and assurance statement, supplied by UChicago. The CAS Description, implementing processes descriptions and systems data are examined, as well as evidence of UChicago's self-assessment of its CAS. Annually the UChicago Board of Governors conducts a 2 – 3 day review of its CAS. This review is chaired by a Board member and staffed with outside experts from academia, industry, and/or other laboratory locations. ASO plays an active role in UChicago's CAS review and utilizes its outcomes within ASO's overall oversight program.

Other routine and annual reports developed by Argonne and B-350 systems are reviewed by ASO staff (SMEs, FRs, Federal Project Directors, CORs, etc.) to verify effectiveness of programs. ASO reviews information and outcomes of Argonne's CAS management systems and assessments to ensure a thorough and comprehensive Integrated Assessment Program.

Weaknesses in Argonne's CAS management systems as seen by ASO may necessitate increased oversight activities by ASO. ASO oversight activities focus assistance and emphasis on Argonne to improve its Contractor Assurance/Management Systems to an acceptable level. Conversely, if continued effectiveness and maturity of the Argonne CAS management systems is demonstrated, ASO may revise its level and/or mix of oversight activities accordingly.

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6.0 ASO Oversight Program Effectiveness

ASO performs self-assessment activities to ensure it has the tools to achieve effective line management oversight of Argonne and B-350 operations and facilities. ASO assesses the effectiveness of its oversight program through three primary mechanisms: external reviews/assessments, quarterly reviews of performance toward APP goals, and ASO self-assessments. The ASO self-assessments include documented reports and periodic ASO-wide organization and goal reviews.

External reviews and assessments, including those performed by SC, provide a source of independent data that is used to assess the effectiveness of the ASO oversight program and may result in opportunities for improvement that require corrective action plans. Typically on an annual basis, ASO develops an Annual Performance Plan which includes goals and objectives related to execution of ASO mission activities. On a quarterly basis, ASO evaluates the site office performance against the commitments made in the APP. The adequacy and rigor of ASO oversight activities are summarized along with any corrective actions or other measures designed to mitigate risks to operations. Finally, ASO performs periodic self-assessments (Facility Representatives, etc.) to document the adequacy of oversight programs and activities.

7.0 ASO Issues Management

ASO has a defined Issue Management Procedure (SOP-12) that features a graded approach. Identified issues for Argonne, B-350 and ASO are evaluated and dispositioned, using a graded approach, per the procedure.

8.0 ASO Performance Trending

Trending is a tool for assessing information to detect developing adverse conditions before they become actual problems. Trending assists ASO in awareness of Argonne and B-350 operations, and to improve ASO internal operations. In many cases, the trending conducted is performed by ASO staff as a part of operational awareness. Positive and adverse trends are also discussed during ASO periodic performance reviews of Argonne, B-350 and ASO performance. Trending tools used include:

- Qualitative review of collective information within the ASO AIM databases;
- Review of Argonne produced trend analysis (e.g., Quad Charts);
- DOE corporately produced trend tools (e.g., ORPS/NTS trends, Corporate Lessons Learned database); or
- ASO staff independently produced trending products.

9.0 ASO Continuous Improvement

Continuous improvement is an important element of the ASO Oversight Program. ASO obtains information toward continuous improvement through several means including:

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- Periodic teleconferences with counterparts in other SC Site Offices;
- Periodic teleconferences with HQ (SC and non-SC) personnel;
- Ongoing review of DOE issued ORPS and Lessons Learned Reports;
- Benchmarking visits to other facilities;
- Implementation of ASO Self-Assessment activities; and
- Implementation of the ASO Lessons Learned Procedure (SOP-11).

10.0 ASO Differing Professional Opinions

During the course of executing ASO mission activities, the potential exists for differing professional opinions (DPOs) to occur. The DPO process may be used by all DOE employees, including DOE contractors and subcontractors, for technical issues related to environment, safety, and health. Most issues can be resolved through routine discourse and processes; the DPO process is not intended as the first step to report concerns or to be used as a way around those local processes. Employees should first use those local processes (e.g., discussions with management, review and comment processes, Employee Concerns Programs, and local DPO processes or their equivalent) to bring attention to the concern. If an employee concludes, however, that routine work processes did not adequately resolve a concern or an issue, the employee should then submit the concern through the DPO process as defined in DOE O 442.2.

11.0 References

- DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*
- DOE O 414.1D, *Quality Assurance*
- DOE G 414.1-1B, *Management and Independent Assessments Guide for Use with 10 CFR Part 830, Subpart A, and DOE O 414.1C, Quality Assurance; DOE M 450.4 -1, Integrated Safety Management System Manual; and DOE O 226.1A, Implementation of DOE Oversight Policy*
- DOE G 414.1-2B, *Admin Chg 2, Quality Assurance Program Guide*
- SC Program Description: *Line Management Oversight*
- SCMS Management System: *Quality Assurance and Oversight, Subject Area: Assessments*, and associated guidance documents
 - *Analyzing and Scheduling Assessment Needs, AS_Pro1.cfm*
 - *Performing Assessments, AS_Pro2.cfm*
- *ASO Contract Management Plan*
- *ASO Quality Assurance Program Description (QAPD)*
- *ASO SOP-11, Lessons Learned*
- *ASO SOP-12, Issues Management*
- *ASO SOP-15, Assessments*
- *ASO Corrective Actions identified in ASOISS-152*
- Letter, J. McBrearty to SC-3 Federal staff, dated March 18, 2013, Subject: Proper Federal Oversight

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- Letter, N. Augustine to S. Chu, dated December 6, 2012, Subject: Culture, Management Principles and Causal Factors – Tolerating the Intolerable and Accepting the Unacceptable.