

[DNFSB LETTERHEAD]

July 31, 1995

The Honorable Archer L. Durham
Assistant Secretary for Human Resources and Administration
Department of Energy
Washington, D.C. 20585

Dear Mr. Durham:

The Defense Nuclear Facilities Safety Board (Board) has reviewed the Department of Energy's (DOE) Implementation Plan SAI-44, *Corporate Approach to Training in the Department of Energy*, dated June 16, 1995. The [enclosed report](#) documents the Board's staff review. The Board recognizes that the corporate approach referred to includes both matters related to health and safety and those that are not. It is because of the former that we have conducted the review you requested.

You will note that there are several items of concern to the Board discussed in the report. Of particular interest are the impact of SAI-44 on the implementation of Board Recommendation 93-3, and the observation by DOE that Implementation of technical training related to [Board] recommendations is inconsistent and unclear. The Board requests that you provide a briefing to the Board that includes: specific details that support the assertion by DOE of inconsistent and unclear implementation of technical training and actions proposed to resolve the concerns described in the enclosure.

If any further information is needed, please let me know.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker
Mr. Thomas W. Evans

Enclosure

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

June 30, 1995

MEMORANDUM
FOR: G. W. Cunningham, Technical Director
COPIES: Board Members

FROM: Timothy J. Dwyer
SUBJECT: Review of Department of Energy (DOE) Implementation Plan SAI-44, *Corporate Approach to Training in the Department of Energy*, dated June 16, 1995

1. **Purpose:** This memorandum provides comments based upon a review of the DOE's Implementation Plan SAI-44, *Corporate Approach to Training in the Department of Energy*, dated June 16, 1995, which was delivered to the Defense Nuclear Facilities Safety Board (Board) in the course of a briefing on Recommendation 93-3 on June 21, 1995. DOE requested that the Board review SAI-44 and provide comments. This review was conducted by Board staff member Timothy J. Dwyer and outside expert Ralph W. West, Jr.
2. **Summary:** DOE's Implementation Plan SAI-44, *Corporate Approach to Training in the Department of Energy*, dated June 16, 1995, has been developed as a blueprint for establishing a corporate approach to formulating and executing training within DOE. However, several aspects of SAI-44 present potential problems:
 - The impact of SAI-44 on the DOE's Recommendation 93-3 Implementation Plan is not clear. Moreover, SAI-44 appears to be preponderantly, if not entirely, concerned with training as distinguished from education. Education, of course, is a significant aspect of the 93-3 Implementation Plan.
 - Several related milestones and initiating actions are undertaken without sufficient knowledge of the most effective and efficient method for accomplishment, or allowance for sequential decision-making and completion.
 - Several aspects of SAI-44 tend to imply, or at least countenance, a diminution of responsibility of heads of DOE Headquarters and field elements for the adequate and appropriate training of their subordinates.
 - The interaction of SAI-44, which addresses both federal and contractor training, with proposed rule 10 CFR 830.330, *Training*, and DOE Order 360.1, *Training*, is not clear.
3. **Background:** As part of the DOE's Strategic Alignment Initiative, as announced by the Secretary of Energy on May 3, 1995, in issuing the report *Saving Dollars and Making Sense*, a series of Strategic Alignment Issue (SAI) Papers were prepared. The SAI Paper AD-9, *Training*, concludes as follows:

Assign responsibility and accountability for developing a corporate training program to the Director of the Office of Training and Human Resource Development; assign responsibility and accountability for execution of the Headquarters training program to the newly established Office of Headquarters Operations and Services (i.e., the Headquarters Service Center).

Mr. Thomas Evans was assigned by the Strategic Alignment Implementation Group as the champion of this issue and was tasked with developing SAI-44 for the implementation of a corporate training approach as described in the SAI Paper. A Training Reengineering Team made up of DOE stakeholders from Headquarters and the field was organized to assist in the development of SAI-44. It should be noted that this team included few, if any, technical line management personnel as members, but was composed almost entirely of training/human resources personnel.

The purpose of SAI-44 is to improve technical and professional capabilities of DOE personnel while reducing the overall cost and manpower associated with contractor and federal employee training. This purpose is to be accomplished by "establishing a corporate approach to formulating and executing training within the [DOE]...." Specific actions to be undertaken include: prioritizing training resources; eliminating redundant training efforts; clearly defining training requirements; and standardizing training planning, budgeting and reporting.

4. **Discussion.**

a. **Plan Content.** SAI-44 sets forth seven Major Milestones for achieving its goal. These are:

1. Establish a Corporate Training and Development Management Council.
2. Consolidate program management and Headquarters support for federal and contractor DOE-wide training (under the Director of the Office of Training and Human Resource Development).
3. Centralize the development of federal and contractor training that have cross-cutting applicability.
4. Standardize the implementation of federal and contractor training programs that have cross-cutting applicability.
5. Establish centers of excellence for key training and development activities.
6. Establish a corporate planning, budgeting and tracking process for federal and contractor training.
7. Integrate training scheduling, registration and records management.

b. **General Review Comments.**

1. Although SAI-44 involves significant activity associated with training, there are no explicit references to or activities associated with Board Recommendation 93-3. Further, it is not clear how SAI-44 will be integrated with the activities currently in progress with regard to the 93-3 Implementation Plan.
 - SAI-44 as a whole discusses corporate training. No mention is made of *education*, which is a significant aspect of the 93-3

Implementation Plan.

- SAI-44 deals with a realignment of DOE responsibilities, but no reference or comparison is made to the *Action Plan for Recommendations Contained in the National Academy of Public Administration's August 1994 Baseline External Assessment Report*, which was developed and delivered to the Board under Commitment 6.3 of the 93-3 Implementation Plan.
- In discussing *Planned Outcomes*, no mention is made of completing the activities associated with the 93-3 Implementation Plan.
- In discussing *Success Measures*, no mention is made of progress in completing the activities associated with the 93-3 Implementation Plan, especially with regard to identifying the competencies required for each DOE technical employee, measuring the delta between these competencies and the incumbents, and tracking the remediation of this delta.
- The sixth *Major Milestone*, which deals with corporate planning, budgeting, and tracking processes, does not include a discussion of the relationship between this milestone and the Individual Development Plan (IDP) process that has become the **primary mechanism for improving the technical competence of DOE through qualification of federal technical employees**. Nor is there any discussion of using the roll-up data from the IDP process as a mechanism for management direction/feedback to lower level organizations/employees.

The impact of SAI-44 on the 93-3 Implementation Plan will not be clear until DOE provides the Board with a formal cross-walk between SAI-44 and the 93-3 Implementation Plan, to indicate any areas of conflict or congruence.

2. SAI-44 appears to be structured to accomplish the stated *Major Milestones* without a thoughtful review of possible courses of action and determination of best solutions to the noted problems. Potential conflicts exist between developing DOE's training and development strategic plan by January 1996 (*Major Milestone #1*), putting a central training organization in place by October 1995 (*Major Milestone #2*), allocating central training organization resources by November 1995 (*Major Milestone #3*), identifying training courses to be centrally developed by March 1996 (*Major Milestone #3*), establishing an in-house cadre of [federal] trainers by November 1995 (*Major Milestone #4*), and selecting centers of excellence by March 1996 (*Major Milestone #5*). It is not clear how these almost concurrent actions can be accomplished in a logical, cost effective manner, especially considering the potential impacts each *Major Milestone* has upon the others. (For example, *Major Milestones #4* and *#5* appear to be diametrically opposed.)

3. Several aspects of SAI-44 appear to suggest a diminution of responsibility for heads of DOE Headquarters and field elements:
 - In discussing *Consensus/Consideration of all Involved Parties*, SAI-44 only speaks to defining the roles/responsibilities of the matrixed training organization.
 - In discussing *Consensus/Consideration of all Involved Parties*, SAI-44 states that Headquarters, field offices, and contractors must relinquish some control and authority to the centralized training organization.
 - In discussing *Organizational Implications*, no mention is made of the fact the head of DOE Headquarters and field elements must recognize *their responsibility* to train the people in *their* organizations.

It is imperative that any definition of the roles/responsibilities/authorities of a matrixed training organization take into account the fact that both organizational *and personal* (i.e., by position) responsibilities must be clearly defined. Further, line managers must remain clearly responsible for the adequate and appropriate training of their subordinates.

4. The interaction of SAI-44, which addresses both federal and contractor training, with proposed rule 10 CFR 830.330, *Training*, and DOE Order 360.1, *Training*, is not clear. This is especially significant with regard to the proposed rule. Significant potential for conflict exists if contractor training requirements from the rule are satisfied (or worse, not satisfied) by federal corporate training.

c. **Specific Review Comments.**

1. It is not clear specifically what type of training activities fall into the category "DOE-wide, cross-cutting training."
2. In discussing *Measures of Success*, SAI-44 emphasizes reducing budget expenditures and manpower requirements for training, "without a *decrease in quality or a negative impact* on corporate excellence." This measure of success is not adequate in itself. It could contradict both Congressional and Board initiatives that are attempting to ". . . raise the technical expertise of [DOE] substantially. "
3. In discussing *Measures of Success*, SAI-44 also emphasizes improving technical and professional capabilities, as viewed by external organizations. Such a measure is misfocused with regard to priorities. More important than the expectations of external organizations are those held by demanding in-house organizations.
4. The fourth *Major Milestone* involves standardizing the implementation of federal and contractor training. Standardization can result in a reduction in

quality of training if *Consensus/Consideration of all Involved Parties* drives standardization efforts to the least common denominator. For example, non-nuclear DOE organizations must not be allowed to weaken standards associated with safety in the defense nuclear complex.

5. The fourth *Major Milestone* indicates that it is preferred to establish a cadre of qualified federal trainers to minimize dependency on the use of contractors for cross-cutting training. This action is not obviously the most efficient or effective method. Several DOE complex Management and Operating (M&O) contractors have already developed significant required training. Therefore, the process of the fifth *Major Milestone*, using centers of excellence, might be preferable. In any case, it could be more efficient to validate and upgrade, as necessary, M&O contractor courses, as opposed to establishing a new training capability in DOE Headquarters.
 6. In the *Proposed Solutions to Barriers*, several barriers from the detailed discussions under *Implementation of Major Milestones* are not carried forward. Similarly, slated *Activities* do not capture all of the actions required to implement the proposed solutions (e.g., no mention is made of those activities associated with necessary contract reform initiatives, or evaluations of existing training organizations).
 7. SAI-44 does not address the applicability/desirability of utilizing outside resources for training, and especially for education. The tight focus on establishing a central training organization may preclude the use of training resources outside the DOE, even in situations where such resources are more competent/timely/economical.
 8. In discussing *Background and Assumptions*, SAI-44 includes the following statement: "Implementation of technical training related to [Board] recommendations is inconsistent and unclear." Although not appropriate for inclusion in SAI-44, it would be instructive if details concerning this statement were presented to the Board.
5. **Future Staff Actions:** The Board's staff will request that DOE provide the following information to the Board:
- A formal cross-walk between SAI-44 and the DOE's Recommendation 93-3 Implementation Plan, to indicate any areas of conflict or congruence.
 - Specific details concerning the statement "Implementation of technical training related [Board] recommendations is inconsistent and unclear."