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REVISION/CHANGE LOG				
Revision/ Change Letter	Description of Changes	Pages Affected	Date of Revision/ Change	Approved By (signature on file)
FR0	Initial Release, replaces CP3-QA-3010	All	04/24/2019	Documentation on file
FR1	Revision to change name, clarify manager roles, provide steps for Operational Program Manager actions, and integrate executive walkdown process to address CA-002255/AI-0003615 and CA-002835/AI-0004510	All	05/04/2022	
FR1A	Non-Intent change to correct Step 6.2.7P	10	05/18/2022	
FR2	Revision to change applicable steps to align with a procedural ownership change CA-004586, AI-0007568 and CA-003700, AI-0006138.	All	02/22/2024	
FR3	Revision to add verbiage to align with CA-005243, AI-0008457, and table updates.	All	10/09/2024	
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1.0 PURPOSE AND SCOPE

1.1 Purpose

To define the process and provide guidance and tools for conducting and reporting Performance/Process Observations (POBs).

1.2 Scope

This procedure applies to Paducah Gaseous Diffusion Plant (PGDP) Deactivation and Remediation (D&R) contractor and subcontractor personnel who conduct and review POBs.

Where department-specific job observation requirements exist, the POB process described in this procedure is the single point for documenting and reporting of data, such as Conduct of Operations (ConOps) Observations. This process also serves as the mechanism for the PGDP D&R contractor's facility/management tour program.

The scope of this procedure is **NOT** intended to include self-assessments, management assessments, or inspections performed within the scope of other procedures.

The sections and steps of this procedure may be performed in any logical order or concurrently as needed to complete the task.

2.0 REFERENCES

2.1 Use References

- CP1-PM-0005, *Classification Review Integration Controls for Converter Component Activities and Other Subject Matter Areas*
- CP2-RD-0002, *Electronic Information System Requirements*
- CP3-OP-1117, *Facility Inspections*
- CP3-QA-1003, *Management and Self-Assessments*
- CP3-QA-3001, *Issues Management*

2.2 Source References

- CP2-HS-1000, *Integrated Safety Management System Description for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP2-HS-2000, *Worker Safety and Health Program for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP2-OP-1001, *Safety Culture Continuous Improvement Plan Four Rivers Nuclear Partnership, LLC, Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP2-OP-1100, *Conduct of Operations Program at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP2-QA-1000, *Quality Assurance Program Description for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*
- DOE O 414.1E, *Quality Assurance*
- DOE O 422.1, *Conduct of Operations*

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3.0 COMMITMENTS

None

4.0 RESPONSIBILITIES

4.1 Program Manager

Defines and communicates expectations and requirements for performance observations including setting goals and performance observation frequency.

4.2 Director

Establishes expectations for POB quality and performance for respective directorates.

4.3 Observing Managers/Observers

- Conducts and documents performance observations of activity level work (ALW) to meet established goals.
- Takes immediate action to have unsafe or non-compliant conditions or actions corrected.
- Ensures that issues identified are entered and tracked as required by CP3-QA-3001, *Issues Management*.

4.4 Contractor Performance Assurance Personnel

- Responsible for the trending of issues as required by CP3-QA-3001, *Issues Management*.
- Assigns focus areas for POBs and communicate to designated personnel.
- Assumes responsibility for POB program and PGDP POB Database.
- Establishes forum, method(s), and roles for achieving Executive Review Board (ERB) oversight of POB results, including goals, trending, and metrics.
- Monitors POB program for consistency and provides training and guidance, as needed, to ensure acceptable POB performance levels and consistency.
- Provides program oversight.
- Coaches/mentors managers on POB performance.
- Conducts training for managers on the POB program.

4.5 Conduct of Operations Manager

- Evaluates ConOps categories monthly to identify weakness, and ensures all ConOps categories are being sufficiently observed.
- Establishes performance goals and expertise for Conduct of Operations Specialists.
- Evaluates potential negative trends in ConOps categories, and takes action.

4.6 Performance/Process Observation Performer's Manager and Observed Department Manager

- Reviews POBs conducted by their employees.
- Ensures observation details are adequate to understanding the observation.
- If POB requires editing, **then** provides feedback to the POB performer.

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4.7 Performance/Process Observation Performer

- Conducts POBs in accordance with this procedure, or other process.
- Enters POB information into PGDP POB Database.

5.0 GENERAL INFORMATION

5.1 The Performance Observation Form (electronic and manual) **CANNOT** contain classified information. **If** the performance observation topic is in a potentially classified subject matter area (e.g., converter component activity area), or uncertain, **then** CP1-PM-0005, *Classification Review Integration Controls for Converter Component Activities and Other Subject Matter Areas*, must be referenced **and** a Derivative Classifier (DC) referred to for guidance on how to generate the performance observation as unclassified. The upfront strategy/guidance from the DC must be followed and a final matter review by a DC is required if the performance observation was within a potentially classified subject matter area.

5.2 POBs are a component of the PGDP D&R Contractor Performance Assurance Program.

5.3 POBs are an effective tool for identifying gaps and degraded conditions, and drift, as well as assessing an organization's operational health and culture. The benefits of this tool include the following:

- Creates and documents a consistent pattern of manager field presence.
- Facilitates the manager-to-worker contact necessary for a healthy safety culture.
- Enables managers to see first-hand actual worker practices and job-site conditions, and offers the opportunity to provide performance feedback to co-workers through face-to-face reinforcement of desired behaviors.
- Improves and sustains performance through detection of gaps and drift.
- Provides an avenue for coaching and correcting gaps and potentially unsafe or at-risk behaviors.
- Facilitates the detection of organizational and programmatic weaknesses.
- Enhances organizational alignment of expectations and values (reduces drift).
- Provides a mechanism for documenting facility and management tour results.

5.4 **When** properly performed, **then** POBs can measure the following:

- Safety culture
- Adherence to safety and operational standards and expectations
- Procedure and work control document quality and utilization
- Process understanding and improvements needed
- Level of gap, drift, and accumulation within a category or Subject Matter Area
- Effectiveness of improvement efforts, administrative processes, and training

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- 5.5 POBs provide an opportunity for interaction between management and workforce personnel, during performance of work in the worker's environment. The establishment of this dialog fosters mutual respect and trust. Workforce personnel are given the opportunity to demonstrate their skills and knowledge level, and to voice concerns. Management has the opportunity to coach and provide or solicit one-on-one feedback.
- 5.6 POB Tiers apply to the type of POB performed. Additional information can be found in Appendix B, *Performance/Process Observation Tier Selection Table and Tier Descriptions*.
- 5.7 POB Categories apply to the specific areas of observation. The POB Categories are listed in Appendix C, *Performance/Process Observation Categories*.
- 5.8 Between revisions to this procedure, POB Tiers and Categories may be added or removed to support the continuous improvement function of the Integrated Safety Management System. Current Tiers and Categories will be reflected in the PGDP POB Database, and this procedure will be updated periodically to reflect existing Tiers.
- 5.9 The PGDP POB Database entry documents the POB. The data is periodically exported and provided to Records Management.
- 5.10 POBs are **NOT** used to replace management or self-assessments as defined by CP3-QA-1003, *Management and Self-Assessments*.
- 5.11 POBs are **NOT** used to replace periodic facility and site material condition inspections conducted according to CP3-OP-1117, *Facility Inspections*.

6.0 INSTRUCTIONS

6.1 Preparation for Performance/Process Observations

NOTE:

Electronic Information System records are generated by/exported from the system Performance Observation Database and submitted to Records Management according to the approved file plan and CP2-RD-0002, *Electronic Information System Requirements*.

POB Performer

- 6.1.1 Review this procedure and the PGDP POB Database to ensure familiarity with POB categories.

NOTES:

- Between revisions to this procedure, Performance/Process Observation Tiers and Categories may be added or removed to support the continuous improvement function of the Integrated Safety Management System.
- Current Tiers and Categories will be reflected in the PGDP POB Database, and this procedure will be updated periodically to reflect existing Tiers and Categories.

- 6.1.2 Refer to Appendix B **and** determine the POB Tier to be performed.

- 6.1.3 Review standards and expectations associated with the activity, as determined by the governing work documents and/or procedures.

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NOTES:

- It is very important to determine the practices and conditions anticipated to be seen during the observation(s).
- Without established expectations, gaps and unacceptable conditions can go undetected.

6.1.4 Establish expectations **and** determine Categories for planned observation(s).

NOTE:

Advanced notification is a good practice, but is **NOT** required.

6.1.5 **If NOT** conducting an impromptu observation, **then** contact the manager or supervisor of activity in advance of observation to inform them of planned observation **and** to ask if there are any specific areas they would like observed.

6.2 Conducting Performance/Process Observations

NOTE:

Electronic Information System records are generated by/exported from the system Performance Observation Database and submitted to Records Management according to the approved file plan and CP2-RD-0002, *Electronic Information System Requirements*.

POB Performer

6.2.1 Prepare for the POB according to Section **6.1**.

6.2.2 **If possible, then** observe pre-job briefing for adequate preparation, participation, appropriateness of required/additional topics and associated detail, and engagement.

NOTES:

- The POB Performer may need to sign on to an applicable Radiation Worker Permit (RWP), Pre-Job Briefing Checklist, or other project document to perform the observation depending on the location of the work being performed.
- POBs **CANNOT** contain Classified Information or Controlled Unclassified Information.

6.2.3 Throughout the observation process, document the following types of information (for later entry into the **Observation Detail Section** of the PGDP POB Database):

- Description (general summary) of the activity observed.
- Number of people observed/interacted with during the observation.
- What went well during the activity (Positive Observations).
- Any gap(s) identified and coaching performed to address the gap(s) (Negative Observations).
- Reinforcement communicated to encourage good practices and safe behaviors.
- Adverse or unsafe conditions.

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- What did **NOT** go well during the activity (Negative Observations).
- Opportunities for improvement.
- **If** known, **then** the reason why things did **NOT** go well during the activity.

6.2.4 Provide real-time reinforcement, coaching, and correction either during the observation or soon thereafter, as follows:

- Reinforce good behavior or process knowledge.
- Coach when a gap(s) is detected.
- Coach personnel who exhibit unsafe or at-risk behavior.

6.2.5 **If** possible, **then** observe post-job briefing for appropriate graded approach/formality, **and** solicitation of feedback from all participants.

6.2.6 **If** necessary, **then** confirm any facts or other details needed prior to entry of the observation into the PGDP POB Database.

6.2.7 As soon as possible following the observation (typically within 3 days), enter observation into the PGDP POB Database:

- A.** Open the PGDP POB Database.
- B.** Select **Entity** (FRNP or DOE).
- C.** Enter **Observation Title**.
- D.** Select POB **Tier Level** from dropdown box, as described in Appendix B.
- E.** Enter POB **Performer (Observer)**.
- F.** Select **Yes** or **No**, indicating whether observer is a director.
- G.** Select POB **Observer's Department** from dropdown box.
- H.** Enter name of **POB Observer's Manager**.
- I.** Enter POB **Observation Date**.
- J.** Enter POB **Duration of Observation (Time in Minutes)**.
- K.** Select POB **Observed Department** from dropdown box.
- L.** Enter name of **Manager of Observed Department**.
- M.** Select POB **Observed Facility** from dropdown box.
- N.** Enter POB **Approximate Number of Personnel Observed**.

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O. Enter the following information:

1. Category: Select POB **Category** from dropdown box.

NOTES:

- Categories (for example, Job Briefings) should have a single “1” Positive or Negative absolute count. High counts of POS or NEG (above 1) should be avoided, as that will skew the numbers. The norm should be a single 1 POS and/or 1 NEG.
- Additional categories may be added as needed to document all categories observed.

2. Number of Positive Observations: Enter “1” for positive categories observed during the POB.

3. Number of Negative Observations: Enter “1” for negative categories observed during the POB.

NOTES:

- **If** the POB results include negative observations, **then** coaching should be conducted for each negative observation, and the details of the coaching entered in the **Notes for Observations** section of the PGDP POB Database.
- Coaching in the form of positive reinforcement is strongly encouraged and should also be documented.

4. Coached: **If** coaching was performed, **then** select “Yes” **and** ensure details of the Coaching are entered in the PGDP POB Database **Notes for Observations** section.

P. **If** more than one Category was included in the POB, **then** select “Add New Row” **and** repeat Step **6.2.7O** until all POB Categories have been entered.

Q. Refer to information documented in Step **6.2.3** **and** enter **Observation Detail**.

R. **If** desired, **then** select “Add Attachment” **and** attach additional information.

S. Select “Submit” to complete the POB entry.

6.2.8 **If** the POB resulted in negative observations, **then** perform an evaluation for issue reporting applicability according to CP3-QA-3001, *Issues Management*:

A. Evaluate POB gaps and conditions.

B. **If** gaps or conditions meet reporting guidance, **then** initiate an Issue Report according to CP3-QA-3001 **or** discuss potential issue with manager of observed organization.

C. **If** the gap(s) **or** condition(s) does **NOT** meet reporting guidance in CP3-QA-3001, **and** the observation owner believes that a significant or valuable learning opportunity exists **or** process improvements are desired to be tracked, **then** initiate an Issue Report according to CP3-QA-3001.

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6.3 PGDP Facility/Management Tour Program

NOTES:

- Tier 1 and Tier 7 observations are also counted in the observation subgroup of Facility Tours.
- DOE-provided inspections and tours may also be entered into the POB database for trending along with FRNP data. The DOE inspections will be identified by the Entity of “DOE”.

Managers

6.3.1 While planning for monthly observations or tours, consider the following practices:

- Schedule blocks of time for Tier 1 or Tier 7 inspections.
- Tailor frequency of tours to higher hazard facilities.
- Review internal and external lessons learned and operating experiences, for use in determining if similar conditions or circumstances exist.

6.3.2 Consider the following practices while performing facility tours:

- Take note (could be mental note) of facility status and conditions that may require further action.
- Include hazardous and unmanned areas.
- Observe for safety conditions and practices.
- Observe for radiological conditions and practices.
- Observe for material and housekeeping conditions.
- Observe routine facility activities, including planning, scheduling, training, shift turnovers, and work evolutions in progress.

6.3.3 **After** completing observation or tour activity, **then** perform the following:

- A.** Document observations and any deficiencies according to Step 6.2.7.
- B.** Ensure the responsible manager or facility manager is included in the observation as **Manager of Observed Department** or as **Additional Email Contacts**.

6.3.4 Where possible, resolve feedback and/or concerns **and** communicate them to workers directly or via one of the PGDP D&R contractor’s communications mechanisms.

6.3.5 **If** feedback **CANNOT** be addressed immediately, **then** ensure that it is entered into the PGDP D&R contractor’s feedback mechanism at **S:/Everyone/Worker Feedback**, or entered as a safety suggestion.

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6.4 Analysis and Reporting

Contractor Performance Assurance Program

- 6.4.1** Analyze observation data on a monthly basis **and** issue report to include, at a minimum, the following:
- A.** Summary
 - B.** Focus Area(s) for upcoming observation periods
 - C.** Observation Data (Total and Manager)
 - D.** Category Data (for past month and previous six months)
 - E.** Conduct of Operations associated categories
 - F.** Corrective Actions and Preventive Actions (CAPA) initiated for potential trends
- 6.4.2** Distribute report monthly.

NOTE:

Periodic Executive Review Board (ERB) briefings may be performed specific to observation data reporting/metric, or observation data may be incorporated into Safety Management Program Health Reports (such as Conduct of Operations, Nuclear Maintenance Management Program [NMMP], etc.).

- 6.4.3** Periodically brief ERB on observation data.
- 6.4.4** Include ERB Chair on observation reporting, goals, trends, and metrics.

6.5 Conduct of Operations Analysis

Conduct of Operations Manager

- 6.5.1** Evaluate ConOps categories, to include the following:
- Adequate quantity and quality of observations including ConOps categories.
 - Results of ConOps category data reported.
 - Status and/or progress of areas and/or categories of concern.
 - Identification of ConOps focus areas for upcoming observation periods.
- 6.5.2** Communicate ConOps focus areas to Conduct of Operations Specialists/Mentors.
- 6.5.3** Monitor results of areas of concern, for improvement or continued degradation.

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7.0 RECORDS

7.1 Records Generated

The following records may be generated by this procedure:

Observation data is periodically exported and provided to records management.

Forms are to be completed according to CP3-OP-0024, *Forms Control*.

Electronic Information System records are generated by/exported from the system Performance Observation Database and submitted to Records Management according to the approved file plan and CP2-RD-0002, *Electronic Information System Requirements*.

7.2 Records Disposition

The records are to be maintained according to CP3-RD-0010, *Records Management Process*.

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Appendix A – Acronyms/Definitions

ACRONYMS

CAPA – Corrective Actions and Preventive Actions

ConOps – Conduct of Operations

D&R – Deactivation and Remediation

DC – Derivative Classifier

DOE – U.S. Department of Energy

ERB – Executive Review Board

HIC – Hazard Identification Checklist

IV – Independent Verification

JHA – Job Hazard Analysis

NMMP – Nuclear Maintenance Management Program

PGDP – Paducah Gaseous Diffusion Plant

PII – Personally Identifiable Information

POB – Performance/Process Observation

RWP – Radiation Worker Permit

SSW – Senior Supervisory Watch

DEFINITIONS

Accumulation – The inconspicuous and seemingly harmless buildup of unusual job-site conditions, at-risk priorities, or similar issues without warning. Accumulation is condition-related, where drift is performance related.

Category – The specific conditions and practices associated with performing work, as identified in the PGDP Performance/Process Observation (POB) Database. Categories are pre-identified in the PGDP POB Database. Additional categories may be included and annotated by selecting the category of “Other” in the PGDP POB Database.

Coach – To mentor, guide, or correct individuals or groups on detected gaps or to communicate best practices. Coaching is a powerful tool for preventing Drift.

Condition – The actual existing state, situation(s), and circumstances of the plant or workplace environment.

Contact Rate – The number of workers contacted/observed by senior managers over a period of time. Tier levels that include worker contact by managers (superintendent level or higher) are applicable to contact rate(s). POB metrics for worker contact rates should be filtered to provide more accurate data for the manager-to-worker contact rate(s).

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Appendix A – Acronyms/Definitions (continued)

Drift – When field practices/process understanding gradually moves away from process/expectations over time. What began as a performance gap now becomes a new norm. If left undetected, drift will eventually contribute to or cause an event.

Expectations – The Desired approach and behavior(s) to accomplishing work (imagined reality).

Export Controlled Information – Certain unclassified Government information under the Department’s cognizance that if generated by the private sector, would require a specific license or authorization for export under regulations. Information and technology regulated by the Export Administration Regulations, 15 CFR Parts 742, 744, and 746, and the International Traffic in Arms Regulations, 22 CFR 120.21.

Gap – When a Practice does not meet the Performance/Process Expectation, or the performance/process understanding is flawed. It is the difference (gap) between Expectation and the Practice.

Official Use Only – Text Deleted

Personally Identifiable Information (PII) – DOE defines PII as any information about an individual maintained by an organization, including but not limited to, education, financial transactions, medical history, and criminal or employment history and information that can be used to distinguish or trace an individual’s identity, such as their name, social security number, date and place of birth, mother’s maiden name, biometric records, etc., including other personal information which is linked or linkable to an individual.

Practices – The actual approach and behavior to accomplishing work (allowed, ignored, or undetected by management or Subject Matter Expert).

Tier – The type of POB performed. They indicate whether employee(s) or paper was observed, and whether a specific field evolution or a walk through was performed. Each tier has merit, and a purpose.

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Appendix B – Performance/Process Observation Tier Selection Table and Tier Descriptions

POB Tier Selection Table																
Management Level	Tier															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Supervisor	N/A	N/A	Y	Y	Y	N/A	Y	N/A	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Manager or Higher	Y	Y	Y	Y	Y	Y	Y	Y	N/A	Y	Y	Y	Y	Y	N/A	N/A
Other/ConOps	N/A	N/A	Y	Y	Y	N/A	N/A	N/A	N/A	Y	Y	N/A	Y	Y	N/A	N/A
CTR/Subcontract Oversight/Project Manager	N/A	Y	N/A	N/A	N/A	N/A	Y	N/A	N/A	N/A	N/A	Y	Y	Y	Y	N/A
Union	N/A	Y	Y	Y	N/A	N/A	Y	N/A	N/A	N/A	N/A	N/A	Y	Y	N/A	Y

POB Tier Descriptions
Tier 1: Senior Manager Walk-Through
Tier 1 observations are used by senior managers to document the frequency of field presence and worker contact, and interface with personnel in their work environment. Tier 1 observations require no planning, and can be documented after the observation. Tier 1 observations are also used to document Executive Tours.
Tier 2: Targeted Field Observation
Tier 2 observations are used primarily to conduct POBs for specific field evolutions. They are performed to document the frequency of field presence, worker contact, and interface with personnel. They can be planned/scheduled based on the risk or type of activities desired to be observed, or they can be conducted impromptu while in the field, control room, shop, etc. They should be used to evaluate a field activity against standards, requirements, and expectations. If planned, then the observer should draft/collect expectations prior to observing the activity.
Tier 3: In-Progress Document Observation
Tier 3 observations are used to evaluate in-progress document development against standards, requirements, and expectations. Work packages, procedures, or design changes are typical in-progress documents that would be reviewed. Tier 3 observations can be planned/scheduled or impromptu. Tier 3 observations do not result in manager presence in the field, which is a primary purpose of the POB program. Tier 3 observations do not get credit for worker contact. If observing a field walk-down, hazard analysis, etc., a Tier 2 should be selected.
Tier 4: Meeting Observations
Tier 4 observations are used to document meeting observations against standards, requirements, and expectations. Tier 4 observations can be planned/scheduled or impromptu. Tier 4 observations do not get credit for worker contact.
Tier 5: Operational Drills
Tier 5 observations are used to document operational drill performance. Tier 5 observations do not get credit for worker contact. Only the Controller (person conducting the post-drill critique) should select the Tier 5 (the intent is one per drill conducted). Other observers (not evaluators) should select either Tier 2 or Tier 9.

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Appendix B – Performance/Process Observation Tier Selection Table and Tier Descriptions (continued)

POB Tier Descriptions
Tier 6: Senior Supervisory Watch, if applicable
Tier 6 observations are used to document Senior Supervisory Watch (SSW) observations. The SSW personnel may be PGDP D&R contractor managers or subcontract personnel. Tier 6 observations do not get credit for worker contact, unless the SSW campaign is primarily performed by PGDP D&R contractor managers.
Tier 7: Inspection/Walk-Through
Tier 7 observations are used to document housekeeping, safety, and other types of inspections or walk-throughs, that do not meet the description of other tiers. Tier 7 observations do not get credit for worker contact. If conducted by a senior manager, either Tier 1 or Tier 7 may be used to document the inspection/walk-through. Tier 7 POBs may be conducted by any personnel.
Tier 8: Emergency Preparedness Drill
Tier 8 observations are used to document emergency preparedness drill performance. Tier 8 observations do not get credit for worker contact. Only the drill lead (person conducting the post-drill critique) should select the Tier 8 (the intent is 1 per drill conducted). Other observers (not evaluators) should select either Tier 2 or Tier 9.
Tier 9: Supervisor Job Observation
Tier 9 observations are used to document supervisor job observations, as prescribed/directed by operations or maintenance administrative procedures. Tier 9 observations do not get credit for worker contact rate calculations, because supervisors are expected to be interfacing with workers continuously.
Tier 10: Management Observation
Tier 10 observations are conducted by managers for their respective subject matter areas (SMA). The purpose of the Management observation is to observe the understanding and practices associated with a manager's respective SMA.
Tier 11: Conduct of Operations Specialist or Conduct of Operations Manager
Tier 11 observations are conducted by Conduct of Operations personnel. This tier is reserved for Conduct of Operations Specialists or Conduct of Operations Managers performing routine CONOPS observations.
Tier 12: Nuclear Criticality Safety Observation
Tier 12 is reserved for Nuclear Criticality Safety personnel. This tier is primarily used by Nuclear Criticality Safety Officers, but may be used by any NCS personnel while observing for Nuclear Criticality Safety practices, postings, and conditions.
Tier 13: Process Observation
Tier 13 observations are used by any personnel when performing an observation on a process. Typically, the observer would not be the SME for the process being observed. The Functional Area Manager and/or the SME of the respective process should be entered as additional email distribution.
Tier 14: Enhanced Oversight
Tier 14 observations are used at management direction, for the purpose of specific, discrete enhanced oversight campaigns. This tier is typically used by superintendent level or higher, but can be used by any employee assigned or requested to perform enhanced oversight.
Tier 15: DOE Observation
Tier 15 is reserved for DOE personnel performing oversight of contractor activities.
Tier 16: Union Observation
Tier 16 is used for union personnel performing observations of activities that aren't captured in another Tier level.

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Appendix C – Performance/Process Observation Categories

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Abnormal Conditions	Notifications
Adherence to Hazard Controls	On-Shift Training
Asbestos	Operator Aids
Barricades (Non-Rad)	Organization and Administration
Communications	Other
Component Labeling	Personal Protective Equipment (PPE)
Control Area Activities	Procedure Quality
Control of Documents	Procedure Usage
Control of Equipment and System Status	Radiological Controls
Control of Interrelated Processes	Regulatory
Criticality Safety	Regulatory Compliance
CTR Oversight	Required Reading
Document Quality (Non-Procedure/Package)	Respirator Inspection/Use/Storage
Drill Play	Rigging and Lifting
Electrical Safety	Safety Culture
Environmental	Safe Work Practices
Equipment/facility Condition	Sampling(Characterization, Rad, IH)
Ergonomics	Shift Routines & Operating Practices
Escorting	Signage
Fall Protection/Elevated Work	Spotter Performance
Feedback	Supervisory Oversight
Hazard Analysis (HIC/JHA)	Timekeeping
Hazard Communication	Timely Instructions/Orders
Heavy Equipment Operation	Training
Housekeeping	Turnover and Assumption of Responsibilities
Human Performance (HPI) Tool Usage	Vehicle/Cart Operation
Investigation of Abnormal Events, Cond. & Trends	Verifications (IV or Concurrent)
Job Briefings (Pre or Post)	Waste Management
Lessons Learned	Work Package Quality
Lockout/Tagout	Work Package Usage
Log Keeping	
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