



Department of Energy
Office of Science
Washington, DC 20585

May 23, 2023

MEMORANDUM FOR OFFICE OF SCIENCE SITE MANAGERS AND
LABORATORY CHIEF OPERATING OFFICERS

FROM:

JUSTON FONTAINE
DEPUTY DIRECTOR FOR OPERATIONS

A handwritten signature in black ink, reading "Juston Fontaine", is placed over the printed name.

SUBJECT:

Guidance on Conduct of High Risk/High Hazard Work and Peer
Review for Operational Advancement (PROActive) Program at
SC-Stewarded National Laboratories

The Office of Science's (SC) ability to perform world class discovery science is underpinned and enabled by excellence in operations. Safety is a core and inviolable value across the Department of Energy (DOE) and the Office of Science. Given the significant world-leading scientific missions at each of the 10 SC National Laboratories, we must remain diligent in prioritizing the protection of all employees and personnel, the public, and the environment.

Our complex has recently experienced incidents that have not reflected our standards of excellence in operations. In certain cases, we are reacting to, rather than anticipating, incidents that can or have resulted in serious consequences. SC should lead by example, demonstrating our commitment to safety and seeking continuous improvement. As part of that vision and commitment, I am instituting two changes within the SC complex.

On certain occasions, we perform high risk/high consequence work when a laboratory is in a limited operational status, such as during holiday shutdowns, weekends, or on back shifts in an attempt to minimize the impact on science. While the objective is well intentioned, it can sometimes lead to the execution of the highest risk and highest consequence work when our ability to perform, support, and oversee that work, as well as our ability to respond to an unexpected situation, is not commensurate with the hazard. We need to take the lessons that we have all learned, at times the hard way, and incorporate them into our work planning and execution going forward.

Therefore, effective immediately, high risk/high consequence work shall only be performed at an SC Laboratory when the Laboratory's ability to perform that work, fully support the activity, and respond to a potential unplanned event is consistent with the capabilities available on a typical midweek day shift. If high risk/high consequence work is normally scheduled to be performed outside of the normal workday, that work either needs to be rescheduled or the full complement of necessary resources must be on site and able to perform and support that work. This encompasses efforts from planning to recovery as well as any necessary laboratory and federal oversight.

It is not my intent, nor am I able, to define exact circumstances when the guidance contained herein is applicable; rather, I expect each of you to implement this guidance responsibly and with a necessary questioning attitude. This guidance does not apply to emergency work or emergent situations where immediate actions to mitigate a concern or condition must be addressed, but I expect that the same mindset and rigor will go into performing work in these situations as well. I do expect that once the situation is stabilized, the Laboratory will exercise good judgement in ensuring that appropriate resources are in place prior to the continuation of work to ensure the safety of our workforce.

Separately, as part of our commitment to continuous improvement and critical self-evaluation, in collaboration with Site Office and Laboratory leadership, I am instituting a new field-organized, field-led peer review program for the 10 SC-stewarded National Laboratories. Focusing on the proactive review of specific operational practices or areas of operational safety, the primary objective of the new Peer Review for Operational Advancement (PROActive) Program is to provide for performance-based analysis and observations on the safe conduct of work. Further, the program will aim to cross-pollinate good practices and lessons learned across the SC complex with the ultimate goals of enhancing safety culture and preventing operational incidents. In other words, rather than a reactive review or analysis as the result of an operational event, this peer review program should instead focus on operations or programs that are seemingly effective. By concentrating on the evaluation of “business as normal,” we strive for continuous improvement and protect against tunnel vision.

The peer reviews will be co-sponsored by the cognizant Laboratory Chief Operating Officer and Site Office Manager as a reflection of our partnership and integrated stewardship model. A core tenant of the PROActive Program is that it be planned, led, and executed in the field. With this in mind, the majority of the details on initiation, membership, duration, and scope are at the discretion of the sponsoring Site Office Manager and Chief Operating Officer. At a framework level, my expectations for the process include:

- Scope: Each PROActive cycle (a “cycle” is defined as a minimum of 4 representative SC Laboratories initiating and executing a peer review) will focus on a specific area, determined by the SC Site Office Managers and Chief Operating Officers and/or the Office of Science Deputy Director for Operations, informed by safety trending data. However, as necessary to sustain or improve site operations, Site Office Managers and Chief Operating Officers are encouraged to identify additional topic(s) to be included in PROActive reviews. The first PROActive cycle will focus on high-hazard energy control. In terms of planning for future cycles, and likely as we get closer to the end of this calendar year, we will collectively discuss focus areas for future PROActive cycles.
- Charge Letter: A charge letter to the review committee shall be used to initiate a peer review. The charge shall be signed by both the Site Office Manager and Laboratory Chief Operating Officer for the laboratory under review with cc to the Deputy Director for Operations.
- Review Committee: The cognizant Site Office Manager and Chief Operating Officer, with input from peers as appropriate, will determine the size and composition of the review committee as well as the necessary duration for the review. Review committees shall be comprised primarily of skilled laboratory practitioners, with the participation of

SC federal personnel, as necessary. Limited positions on the review committee shall be reserved for staff experience and developmental purposes.

- Planning and Execution: The review committee is to determine documents, policies, procedures for review and the review's schedule of observations and interviews. The review committee is to work with the relevant Laboratory to ensure adequate access is provided on-site during the review.
- Deliverables: The nature of any deliverables shall be determined by the Site Office Manager and Chief Operating Officer and may vary from review to review. As these engagements are not intended as compliance reviews, there shall be no "findings." Reviews shall identify observations, opportunities for improvement, and lessons learned. The accountability for follow-up action rests with Site Office and Laboratory management. In addition, as a result of each review, the Site Office Manager and Chief Operating Officer are responsible for providing best practices and lessons learned to the SC Field Operations Coordinator for dissemination, as necessary, to the SC complex.
- Record Keeping: To ensure awareness of progress under the peer review program, the SC Field Operations Coordinator shall maintain a basic record of each review, to include a scope description, review committee participant list, and charge letter.

With an enhanced proactive peer review process and mindful work scheduling, I am confident that we can continue to positively influence safety culture and safety outcomes within the SC complex. I thank you for your continuing efforts to ensure the safe conduct of operations at our laboratories.

cc:

Jessica Halse, Associate Deputy Director for Operations
Sarah Norris, Field Operations Coordinator