

## **Appendix B**

- I. Examples of Documents for Designating a NEPA Document Manager**
  - II. Guidance for NEPA Document Managers**
-

United States Government

Department of Energy

Oak Ridge Operations

# memorandum

DATE: December 17, 1996

REPLY TO:  
ATTN OF: ER-111:Wilfert

SUBJECT: **NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENT MANAGER FOR THE NATIONAL SPALLATION NEUTRON SOURCE (NSNS) PROJECT**

TO: David K. Wilfert, Acting NSNS Project Manager, Program Coordination Division, ER-111

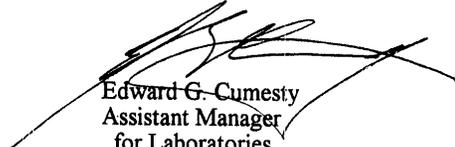
References:

1. Secretarial Policy on National Environmental Policy Act, June 1994.
2. Director, Office of Energy Research determination to prepare an Environmental Impact Statement (EIS) for the NSNS, February 6, 1995.
3. ORO Manager's delegation of authority for designating NEPA Document Managers, August 29, 1994

You are designated the NEPA Document Manager for preparation of an Environmental Impact Statement (EIS) for the NSNS project. Responsibilities of this assignment are identified in the June 1994 Secretarial Policy (Reference 1), and include:

- Considering innovative measures to reduce NEPA process time.
- Requesting (as needed) reasonable variances to Department NEPA regulations.
- Elevating any internal Departmental disputes for prompt resolution.
- Evaluating contractor performance for NEPA document preparation.
- Providing "feedback" to the Office of Environment, Safety, and Health on lessons learned during NEPA process implementation.

You should work closely with the ORO NEPA Compliance Officer (Patty Phillips) in carrying out this assignment. Please keep me informed of your plans and progress.



Edward G. Cumesy  
Assistant Manager  
for Laboratories

cc:  
M. Kass, ER-111, ORO  
P. Gross, SE-32, ORO  
I. Thomas, ER-10, HQ/GTN  
C. Hickey, ER-8, HQ/GTN



U.S. DEPARTMENT OF ENERGY

MEMORANDUM

DATE October 31, 1997

REPLY TO Michael D. Holland, BHG

SUBJECT **ENVIRONMENTAL IMPACT STATEMENT FOR THE HIGH FLUX  
BEAM REACTOR (HFBR) TRANSITION PROJECT**

TO See Distribution

Nand K. Narain, Ph.D, of the Brookhaven Group, will be the Document Manager for the HFBR Environmental Impact Statement. Dr. Narain has extensive experience in project management and environmental documentation.

Nand can be reached by phone at (516) 344-5435, or by e-mail at [narain@bnl.gov](mailto:narain@bnl.gov).

A handwritten signature in cursive script that reads "M. Holland".

Michael D. Holland, Project Manager  
HFBR Transition Project

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# **National Environmental Policy Act Document Managers Guidance**

**Prepared by the  
U.S. Department of Energy  
Office of Science  
And  
Chicago Operations Office**

**May 31, 2000**

## INTRODUCTION

This guidance will help the NEPA Document Manager (NDM) perform his or her duties. The roles and responsibilities of the NDM are described in DOE Order 451.1A and this guidance provides additional information to help the NDM implement those roles and responsibilities. The guidance is based on lessons learned from management experience. No attempt is made to address the content of the NEPA documents, this is well presented in numerous DOE and CEQ guidance. This guidance is applicable to both simple and complex documents and assumes a basic familiarity with the DOE NEPA Compliance Guide (Volumes 1 and 2) as well as basic project management principles.

The roles and responsibilities of the NDM as listed in DOE Order 451.1A are:

1. Establish a team, representing all necessary DOE Elements to plan, assist in preparing, and concurrently review documents.
2. Conduct an early internal scoping process.
3. Maintain tracking systems to monitor costs of and adherence to the schedule for the NEPA process.
4. Manage the document preparation process, including reviewing internal drafts for technical adequacy, controlling costs, and maintaining schedule.
5. Encourage and facilitate public participation throughout the NEPA process.
6. Evaluate upon completion of the environmental impact statement (EIS) or environmental assessment (EA), any support contractor's performance for timeliness, quality, cost-effectiveness, responsiveness, and application of requirements and guidance.
7. Report to the Office of NEPA Policy and Assistance on lessons learned after completing the EIS or EA.

These highlight the NDM's major focus areas in managing the NEPA process from initiation through approval of the final document to completion of the lessons-learned report. Functionally the NDM is charged with accomplishing all elements of the objective (scope-of-work), in a finite time frame (schedule), and within financial constraints (budget). Therefore, conceptually, this is no different from managing other projects.

Another role not specifically expressed, but is a primary element of the NDMs role in the NEPA process is that of a liaison between the various "players" involved in the NEPA process. The following table defines the "players" and their roles in the process.

<b>NEPA Players</b>	<b>Roles and Responsibilities</b>
DOE NEPA Compliance Officer (NCO)	<ul style="list-style-type: none"> <li>◆ A source of general NEPA information as well as a resource person for dealing with particular NEPA issues.</li> <li>◆ Provides QA/QC on the NEPA process and on the NEPA document.</li> </ul>
DOE Project Manager (DOE PM)	<ul style="list-style-type: none"> <li>◆ Responsible for the management of the total project or "Proposed Action" as described in the NEPA document.</li> <li>◆ Responsible for the overall project scope, cost, and schedule that may be impacted by the NEPA process (cost and schedule).</li> </ul>
<p>Advisory Review Team (ART)</p> <ul style="list-style-type: none"> <li>◆ Consists of all essential DOE elements including, the NCO, appropriate management, technical specialist, legal counsel, and public relations.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Responsible for participation in internal scoping, review of draft documents, recommending changes to document and informing their management as to the status of the project.</li> <li>◆ Concurs on NEPA documents and recommends concurrence and/or approval to their management.</li> </ul>
<p>Document Preparation Team (DPT)</p> <ul style="list-style-type: none"> <li>◆ May consist of DOE, as well as contractor personnel.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Responsible for data collection, writing, editing and making revisions to the NEPA document.</li> </ul>
Contractors	<ul style="list-style-type: none"> <li>◆ May be used in the preparation of the NEPA document. Roles and responsibilities are provided in the Contractor Reform Guidance (found in the NEPA Compliance Guide), as well as can be determined by the ART during internal scoping.</li> <li>◆ May serve as Subject Matter Experts for specialized analysis and reviews, as needed.</li> </ul>
Contractor DPT Project Manager	<ul style="list-style-type: none"> <li>◆ Responsible for delivering the document in accordance with the scope-of-work, on schedule, and within budget</li> </ul>

## **GETTING STARTED**

### **NDM Appointment and Orientation**

Once the decision has been made to prepare an EIS or an EA, the responsible Assistant Secretary or Field Office Manager will appoint the NDM, frequently on the recommendation of the NEPA Compliance Officer (NCO). A November 1998 guidance memo, provided by the Office of NEPA Policy and Assistance, on the knowledge and skills required of a NDM and the NEPA resources available can be found on the EH NEPA Web Site (<http://www.tis.eh.doe.gov/nepa>).

The NCO discusses the NEPA process with the NDM, as it is described in CEQ 40 CFR 1500-1508, DOE 10 CFR 1021, the DOE Secretarial Policy Statement, DOE Order 451.1A, and other applicable federal regulations or executive orders. These are contained in DOE's NEPA Compliance Guide. The NCO will ensure that the NDM is aware of the current NEPA implementation procedures. Other discussion topics may include:

- The action being proposed and possible alternatives, the purpose and need for the document,
- Whether other Agencies, Federal, state, local, or Indian tribes need to be included as a cooperating or consulting agency, and
- Composition of the Advisory and Review Team.

The NDM meets with the DOE PM who provides:

- The projects overall schedule and the required document completion date, the budget allocation, and
- An estimate of management and administrative support accessibility, technical staff availability, space and equipment to be provided.

### **Establishment of the Advisory and Review Team**

An Advisory and Review Team (ART) should be established as early in the process as possible. The Team functions as a combination board of directors and stakeholders to ensure the successful completion of the document. The ART members will provide concurrence on the documents and recommend concurrence by their management. For an EA, the ART will be responsible for making a recommendation to the PSO on the threshold determination on whether to issue a Finding of No Significant Impact or begin the EIS process. ART meetings should be held on a regular basis to provide issue resolution, coordination, technical guidance, and in-process review. One of the ART's most important, and earliest, responsibilities is to participate in internal scoping. The most experienced people possible are selected for the team. Cooperation with local DOE and HQ managers ensures that their people will be available when needed. The team includes:

- The NDM
- The NCO
- Project Manager, and others from the proposing organization, as needed.
- Reviewing organizations such as EH and other Program Offices
- Senior technical specialists (both DOE and contractor, if available)
- General Counsel representative
- Contractor PM (if already available)
- Public Affairs representative (if needed)

## Internal Scoping

Internal scoping refers to the process of designing the scope, content, and schedule of the NEPA document. Internal scoping is conducted by the ART whose goal it is to gain consensus on issues concerning:

- the project decisions that would be supported by the NEPA process,
- the proposed action,
- the scope and contents of the NEPA document
- the required depth of analysis (sliding scale), and
- the schedule of major milestones

The DOE Operations Offices are required to have a Quality Assurance Plan for Environmental Assessments. This document provides additional important Operations Office specific guidance concerning internal scoping procedures.

The first task of the ART during internal scoping is to review the purpose and need of the proposed action, define the proposed action, and all alternatives that will be considered. Early in the internal scoping process a determination is made regarding the sufficiency of the information available from which an impact evaluation can be made. For example, if the proposed action is the siting of a building, details must be available on the location, footprint, size, parking lots and other ancillary structures, building function, energy and other resource requirements, anticipated emissions and other wastes, number of people to be employed, noise generation, traffic potential, storm water management, and other factors. This is true for the alternatives as well. Usually the amount of information required for an impact analysis of a conventional construction project is contained in a Title I or Preliminary Design. This includes design studies, alternate design approaches, energy conservation evaluations, and analysis of health, safety, and environmental aspects of the project.

Secondly, the ART makes a preliminary evaluation of the environmental parameters included in the description of the affected environment. This will be based on those elements most likely to be impacted by the proposed action and alternatives and conversely, will eliminate those with no likelihood of impact. For example, if the proposal is to build a road across the desert, it is probably not necessary to include much

description of the water resources. This evaluation will also identify those environmental parameters that are of the most importance, or that require detailed analysis or special treatment such as a floodplain/wetlands assessment.

A determination is made at this time on the probable availability of data to describe the affected environment at the level of detail required. If new field data are required, as in a pre-operational monitoring study, or if special studies are indicated, they will add cost and may impact the schedule. NEPA documents requiring extensive new field data have been known to cost an order of magnitude more than those with data easily available. Special studies may also be required and should be identified at this time. They will need to be completed so that their results can be extracted and incorporated into the impact analysis. For example, if the proposed action has operations with a high accident risk potential, an accident risk assessment may be required. The time required to complete a hazard analysis, develop accident scenarios, assess accident frequency and consequence, and evaluate risk may delay the completion of the document unless started early.

The requirements and procedures for the internal review of preliminary draft and preliminary final material are established after the schedule is considered. It is not unusual for reviews, comment resolutions, and signature concurrence to take longer than the writing and production of both draft and final documents. Considerations should include the number of reviews expected, the times to be allotted, consolidation of comments by organization, distribution of software containing standard forms, need for formal response, and meetings for comment resolution with the reviewing organization. Special QA requirements are identified at this time.

The skeleton of a public participation plan or the public scoping process is drafted during this meeting. Public participation in the NEPA process is specifically required in the preparation of an EIS. Public scoping is explained in the Council on Environmental Quality Regulations (10 CRF 1500-1508), as well as DOE's Implementing Regulations (10 CFR 1021). The EA QA Plan (previously mentioned) also contains a Public Participation Plan.

Public participation should be considered for EAs that may have public controversy. Just as the range of alternatives and level of analysis may vary in NEPA documents, depending upon the level of potential impacts, so should the range of public participation opportunities. In applying this "sliding scale" approach, the extent of opportunities should increase as the potential for environmental impact increases. Even with relatively insignificant environmental impacts, more participation opportunities should be provided when there is substantial interest in or controversy regarding a proposed action. Emphasis is placed on establishing a meaningful dialogue with the public and soliciting their involvement rather than merely seeking information. Public planning also includes actively seeking the participation of minority and low-income populations.

## **MANAGEMENT PLANNING**

### **Defining the Work Scope**

Each NEPA document project is broken down into manageable units. The organization of these work elements provides a definition for the scope of work. The first step includes a list of all major tasks that must be accomplished. For example, public participation, field studies, special studies, preliminary draft document, draft document, preliminary final, and final document. The list contains major tasks required to take the project from the beginning to the end. Each of these will have sub-tasks.

Public participation, for example, contains scoping as one of its subtasks. Each subtask in turn will have a series of activity elements required for completion of its objective. Using scoping as the subtask example, activities will include development of the public scoping strategy, deciding on meeting locations, preparation of notices, advertisements, information papers, meeting presentations, newsletter articles, exhibits, and possibly establishing a 1-800 hot-line. The scoping meetings require logistical and coordination support including arranging suitable facilities, transportation, setting up and breaking down of display exhibits, providing information materials, and preparing a summary that includes activities at local information meetings. The summary includes all comments, questions, and information requests that were collected.

### **Building the Work Breakdown Structure(WBS)**

A common frame of reference is established for relating job tasks to each other and to project costs and schedule. Activities associated with each subtask are placed in a logical sequence, i.e. the order in which they must take place. Some of the activities will have to be completed before the next can begin-usually because their product is needed to start the next activity. Others may need input from preceding activities but can be started before the preceding activities. Identification should also be made of activities in the sequences that are not dependent on preceding activities so they can be performed in parallel. Indication is made of where the activity product fits into the sequence. A logic diagram is a very useful tool for this process. The result shows a network of tasks, subtasks, and activities, demonstrating how they fit together, and identifying major milestones.

Next, a hierarchical numerical designation is assigned to each of the tasks, subtasks, and work activities to be scheduled and budgeted. For example:

- 1.0 Preparation of Draft EA
  - 1.1 Public Participation
    - 1.1.1 Scoping
      - 1.1.1.1 Develop public scoping strategy
      - 1.1.1.2 Identify and secure meeting locations

- 1.1.1.3 Prepare public notices, advertisements, information papers, and exhibits
- 1.1.1.4 Develop a public comment and response tracking system

Limiting the breakdown to the fourth level, as above, an EIS could produce up to one hundred WBS items. An EA doesn't necessarily require the development of a WBS, but it can be a useful tool for tracking the development of the document. The preferred level is the minimum needed to meaningfully track the schedule and budget.

**Questions commonly raised are: "How much detail do I need to manage properly? If I continue and describe subactivities and then sub-subactivities, will that level of detail provide me with greater control and allow me to do a better job?" The response is, once you get beyond a certain breakdown level, the information value is greatly diminished and the increased maintenance time required to update the schedule and budget far exceeds any control advantage.**

A Work Breakdown Structure Dictionary containing a brief description of each WBS item is a valuable tool in communicating with management and staff about project activities.

## Developing the Schedule

It is necessary to schedule and track individual tasks, even though the required end-date for the NEPA document has been provided by the DOE PM. The first step is to estimate the length of time required to complete each individual work activity. This is done in consultation with the senior authors of the DPT (including contractors if applicable), and the NCO since, in addition to contributing their experience on the complexity of the technical tasks to the estimate, they can assist in determining the number of staff required.

The length of time is dependent on staffing availability. A summation of the duration for those activities that have to be completed before the next is started will provide the length of time required to complete the subtask. Similarly, treating the subtasks in the same manner, the summation of subtasks will provide the time required to complete the major tasks. A roll-up of these times in turn will provide an initial estimate of the total time to complete the NEPA document. Be sure to include mandated times. The mandated times include:

### EIS requirements

- the 15 day duration between publication of the EIS NOI and initiation of scoping meetings (10 CFR 1021.311)
- 30 or 45 day public scoping period (10 CFR 1021.311)
- No less than a 45 day public/stakeholder comment period for the draft document (10 CFR 1021.313)
- 30 day waiting period between issuance of the final document and publication of the Record of Decision. (10 CFR 1021.315).

#### EA requirements (10 CFR 1021.321 - 322)

- Depending on the complexity of or the issues surrounding the project a 30 or 45 day public scoping period may be necessary.
- 14 – 30 day state and tribal review. 30 day review for Proposed Finding of No Significant Impact in the Federal Register.

It is wise to specify activities that have an uncertain duration. These are items that often exceed the allotted times and are outside the control of the NDM, such as delivery of review comments by other agencies. Most outside agency comments are received at the very end of the comment period.

There is an unofficial Departmental goal of having the median time for the preparation of an EIS be no longer than 15 months. If the total length of time to complete the document is calculated to be unacceptably long, the NDM can either attempt to structure more parallel activities, plan to initiate more activities prior to completion of predecessor activities, or add additional staff effort to shorten the time. Once the NDM has confirmed the duration, actual start and stop dates, or event milestones, can be assigned to each activity. If, as a result of the demands of the schedule, additional funds are needed it is imperative that these issues are discussed with the DOE PM as soon as possible.

### **Controlling Cost**

The NDM will likely be provided a budget for producing a NEPA document rather than going through the exercise of developing the cost estimate. The budget will likely be determined by comparing this effort with similar NEPA efforts and adjusting known costs to account for differences. Even though the challenge for the NDM is to meaningfully distribute the budget proportionately between tasks, rather than pricing out each activity, as in the bottoms up approach, it is still essential to understand how such estimates are made. Otherwise it will not be possible to judge contractor estimates, evaluate cost profiles, or price changes in scope.

Total project cost is comprised of labor cost, other direct costs (ODCs) such as material, travel, printing, copying and graphics, telephones, postage, and contingency. Labor is by far the costliest item in a NEPA project.

At the planning phase there is always a limit on knowing all details to be encountered in implementing a project. It is not unusual for added tasks or requirements to be introduced late, or new data to come to light after the draft has been written. It is not possible to accurately evaluate how many internal and external comments will be received, or how much effort will be needed to resolve them. Consequently a portion of the budget should not be committed but held back for the unforeseen, or contingency. This may represent 10-15% of the total.

## Staffing and Organization

The preparation of the NEPA document will be done by the Document Preparation Team (DPT). The first step in establishing the DPT is to identify the availability of DOE personnel to staff the project and what support must be obtained through contractors. For EAs, the DOE Management and Operations contractor frequently is the DPT and drafts the document and presents it to DOE through the NDM. EISs must be prepared by an entity with no financial or other interests in the outcome of the project for which the EIS is being prepared (40 CFR 1506.5).

The acquisition of contractor support is initiated by the NDM through the development of a statement of work. Model Statements of Work can be found in the NEPA Contracting Reform Guidance, known as the "Tan Book", located in the NEPA Compliance Guide - Volume II and on the EH NEPA Website (<http://www.tis.eh.doe.gov/nepa>). The ART can provide assistance in defining the management, technical, clerical, administrative and public interaction support required of a contractor. A contractor evaluation strategy needs to be discussed so that most selection weighting is given to the area of effort that is most critical to the success or failure of the document. Sufficient time needs to be budgeted to work with the Ordering Contracting Officer to establish the task order strategy, define contractor selection criteria, evaluate proposals, and select the winning contractor. Only the Ordering Contracting Officer is authorized to obligate funds and authorize work to begin.

Space may be necessary to house the DOE technical and if necessary the contractor DPT/support staff together, especially during the development of an EIS. The final product will benefit from such proximity, since producing a NEPA document requires a highly integrated multidisciplinary environment. Achieving this through traveling to meetings, compared to working together, is less productive and not cost effective.

Tasks and subtasks are assigned to individuals on the DPT whose responsibilities include planning and daily supervision of task execution, establishment of work teams for specific activities, early identification and resolution of technical problems, and liaison with other task managers. The "Tan Book" states that the NDM, in coordination with the ART, should develop the "propose and need" as well as the "proposed action", relationship to other actions, and in general ensuring the integration of all the parts. It is very important to have legal counsel as a participant in the ART to assist with the preparation of the "proposed action". The description of the affected environment and the impact analysis is usually divided into subtasks and given to environmental scientists or to specialists in the respective environmental discipline. Special studies such as risk assessment, or specialty tasks, such as public participation, are assigned to experts in those areas. In addition, the use of an editor and a skilled graphics person will greatly enhance a NEPA document. The NDM should read every word of the draft document prior to releasing for any kind of formal review. A good editor will make the NDM's review job much easier.

It is important to develop an organization chart so that everyone understands who has what responsibilities and who reports to whom for assignments, guidance, and supervision. The chart should include members of the ART.

If all of the DPT members are contractor personnel, they will report to and receive direction from that contractor's Project Manager (PM). The PM is the individual contractually responsible for delivering the document in accordance with the scope-of-work, on schedule, and within budget. The PM will report contractually to the NDM who is functioning as the Ordering Contracting Officer's Representative.

The contractor PM is responsible for the general supervision of all technical work performed, ensuring that it achieves a high degree of responsiveness. Administrative duties include review and approval of all work plans, staff selection for each task, monitoring of contract and task funds and schedules, and implementation of all quality assurance/quality control (QA/QC) processes for all work and reports.

## **Document Management Plan**

Once the project planning is complete, it is important to document the initial baseline condition in a Document Management Plan (MP). This is not a DOE requirement, however it is a very useful tool for the NDM and the Document Preparation Team. The MP should contain chapters that:

1. Summarize the project objectives and purpose;
2. Describe the work scope and the WBS;
3. List the major milestones in the schedule,
4. Present the detailed budget,
5. Define how the project is to be managed by illustrating the organizational structure, key personnel assignments, methods for cost and schedule control, and
6. Indicates the anticipated communication process and reporting requirements. Appendices can be used to present the detailed schedule and cost projections.
7. Indicates deliverables by staff against the scheduled milestones.

## **IMPLEMENTATION CONSIDERATIONS**

### **Controlling Resources**

If projects were implemented as planned and budgeted, there would be no need to consider control mechanisms. Unfortunately, from the start differences will emerge. For example, staffing will often deviate from that budgeted, both by changes in the mix of individuals needed in the different labor categories and in the times they are available. Or tasks will get late starts because of the lack of some essential input data and take much longer to complete because of it – impacting dependent tasks. Some task budgets will turn out to have been over-estimated, or implemented at less than budgeted cost, and others will be under-estimated. One class of activities that is always under-estimated is

the time required to achieve consensus by multiple individuals or organizations. Examples include document and comment reviews by other internal organizations, cooperating agencies, and independent reviewers.

By careful attention to the financial reports, the NDM will be able to monitor the status of the budget and evaluate the need for corrective action. The types of options are limited, however. If a task is overrunning, money will have to be diverted from other tasks, taken from contingency, or obtained by additional funding.

Established contractor cost control systems have been used successfully on all sizes of DOE programs to effectively monitor project financial performance. These systems extract data from the timekeeping, accounts payable, general ledger, and other audited/approved internal financial systems, and accumulates direct and indirect costs to provide accurate, current project costs. Direct labor hours, labor costs, and ODCs, including all field efforts are usually entered each week. Reports are generated comparing actual direct labor hours, labor costs, ODCs, and fee against budgets for each contract, task assignment, and work package. Indirect costs are accumulated in the general ledger system into separate cost pools for fringe benefits, overhead, and general and administrative expenses. All of these elements are calculated at the least monthly and are monitored to evaluate trends and determine problem areas. There is more information concerning cost control systems in DOE Order 430.1A, Life-cycle Assessment Management.

## **Meetings and Reports**

Meetings are the essential forum for communication and team building and should be scheduled on a regular basis. They allow the NDM to:

- Provide guidance and technical support in developing and implementing approaches for addressing technical issues;
- Coordinate project staff support to achieve project milestones on schedule;
- Facilitate the interdisciplinary work;
- Anticipate and provide corrective action to problems before they result in a cost and schedule impact and;
- Keep the DOE PM fully informed.

For maximum productivity each meeting should have an objective and an agenda.

The “Kick-off Meeting” is the project start and is devoted to the dissemination of information on scope, budgets, schedules, task breakdown, leadership responsibilities, relationships, space, and other housekeeping items. The kick-off meeting is the occasion when the NDM establishes the constraints of the project and shares his or her expectations with the task managers and the staff. A weekly meeting with the contractor PM, senior staff and task managers should take place either before or after the regular meeting with the ART. The purpose of both meetings is to ensure information on the status of the project goes from the staff upwards, and from the project management and

outside interests down to the staff. Using this interactive communication process, the NDM is included in decisions affecting the completion of all assignments, aware of the status of project activities and any changes in the scope of work, milestone dates, or resource requirements. Complex technical issues should be discussed at special meetings called for that purpose and will include only those staff immediately affected. Informal discussions between the NDM and project staff is encouraged as an opportunity to verify information and ensure that there are no problems that have not been reported and addressed.

The periodic report provided by the contractor PM to the NDM, usually monthly, provides written confirmation of the progress of the effort by task. It shows technical progress made during the previous period compared to schedule and budget. As such it represents the history of the project. Although there are many different electronic formats available, and many formal requirements in the system, the basic standard is referred to as the PPP Report, for Progress, Plans, and Problems. It provides information on the progress made since the last report, by task, the plans for accomplishment in the next period, and any problems impeding task activities. Of particular importance is the review and analysis of the section on project costs. Unlike information on technical progress reported through weekly meetings, cost information is usually only available on a monthly basis. Actual labor hours and cost by task will be compared to budgeted projections for the reporting period - and cumulative profiles. They will be rolled-up to show the total project costs as well.

## **Development and Maintenance of the Administrative Record**

A good filing system is one of the most important project items. Because it is more mundane it is frequently overlooked. It is fundamental to being able to produce an accurate Administrative Record. The Administrative Record is a collection of information pertinent to a NEPA-related action. The purpose of the Administrative Record is to provide a chronological listing of important documents and events or other information to facilitate project administration and future review or consultation on the project. The Administrative Record should include plans, reports, notices, correspondence, distribution lists, letters and responses on comments, presentations, and other records. The Administrative Record also is needed in the event that litigation is brought against the DOE concerning the project. The NDM should consult the NCO for guidance on developing and maintaining the Administrative Record.

## **AT THE END**

## **Evaluation of Contractor Performance**

If a contractor is used during the preparation of the NEPA document, then the NDM is responsible for evaluating the contractor's performance for timeliness, quality, cost-effectiveness, responsiveness, and application of requirements and guidance. There is

DOE NEPA Contractor Performance Evaluation Form located in the “Tan Book”. This form is presented to the contractor at the beginning of the contract so that the NDM's expectations are understood. This evaluation should be completed shortly after completion of the contractor's performance period.

### **Completion of the Lessons Learned Questionnaire**

The Office of NEPA Policy and Assistance (EH-42) has developed a NEPA Lessons Learned program and a questionnaire has been developed to collect and analyze information. NDMs, as well as all members of the DPT, are encouraged to complete it upon completion of the NEPA process. EH-42's Lessons Learned questionnaire requires an evaluation of the overall NEPA process, identification successes and issues, and cost and schedule reporting. A summary of the Lessons Learned are available in the Quarterly NEPA Lessons Learned Report. Copies of the Lessons Learned questionnaire can be completed and viewed on the web at <http://www.tis.eh.doe.gov/nepa>. The NDM should review these lessons learned reports prior to beginning the NEPA process because valuable information could be obtained making the job easier by not repeating mistakes.