



The Secretary of Energy
Washington, DC 20585

June 29, 1990

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
Suite 675
600 E Street, N.W.
Washington, D.C. 20004

Dear Chairman Conway:

Thank you for your June 8, 1990, letter to me forwarding a draft report by your consultant, MITRE Corporation, and for providing the Department an opportunity to comment on the draft report. In that document, your consultant has examined the content of DOE Orders related to nuclear safety and compared them with similar Nuclear Regulatory Commission requirements.

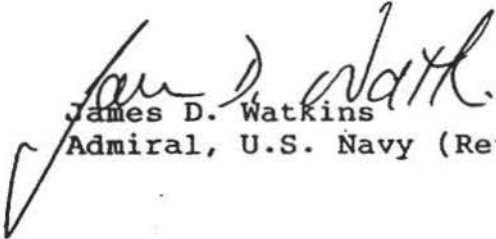
My June 8, 1990, response to Board Recommendation 90-2, transmitted to you on the same day that you transmitted your draft report, addressed in some detail the Department's initiatives relating to DOE nuclear safety standards. As I indicated, issues such as those discussed in your draft report regarding the specificity, consistency and clarity of DOE standards were previously raised in several reports prepared prior to my confirmation as Secretary. Unfortunately, little has been accomplished by the Department in response to those earlier reports. Accordingly, I took the actions described in my June 8 letter.

Initial efforts, of necessity, were focussed predominantly on implementing operational improvements at Savannah River and Rocky Flats, including the development of management plans intended to assess, control and improve the safety of operations at those facilities. However, as discussed in my June 8 letter to you, I have also formed a Task Force on Nuclear Safety Directives to directly address the need for revision of DOE nuclear safety orders and the management responsibilities and authorities related to them. Revised nuclear safety requirements will be reissued by the Department as proposed regulations. These regulations will be supplemented by more detailed guidance documents, a practice followed by the Nuclear Regulatory Commission for commercial reactors. Supplemental requirements issued by operations offices which might conflict with the nuclear safety regulations will be eliminated. Thus, the principal concerns expressed in your consultant's draft report and in earlier reviews will be resolved.

The initial set of proposed regulations is targeted for publication in the Federal Register in the ~~Fall~~, but the entire process of converting DOE nuclear safety orders to regulations is a long-term effort. In the interim, existing standards will continue to be improved through the Department's directives system, resulting in the steadily increasing quality of design, construction and operational practices at our facilities.

Because the charter of the Task Force on Nuclear Safety Directives dovetails so closely with your efforts in this regard, I have transmitted your draft report to the Task Force for its review and consideration as it continues its efforts to improve DOE nuclear safety standards.

Sincerely


James D. Watkins
Admiral, U.S. Navy (Retired)

Enclosure