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# DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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July 1, 1993

The Honorable Hazel R. O'Leary  
Secretary of Energy  
Washington, D.C. 20585

Dear Secretary O'Leary:

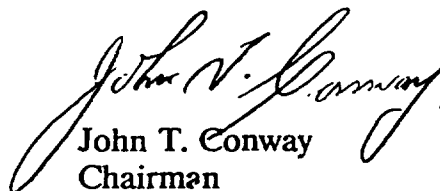
The Board has reviewed the Department's Implementation Plan (Plan) for Defense Nuclear Facilities Safety Board Recommendation 92-7 (Training and Qualification) and its attached cover letter submitted on June 15, 1993. An evaluation of the Implementation Plan for Recommendation 92-7 against the standards set forth in the Board's "Criteria for Judging the Adequacy of DOE's Responses and Implementation Plans for Board Recommendations" (55 Fed. Reg. 43398) has led the Board to determine that the Plan is unacceptable as a strategy for achieving the recommended improvements in training and qualification. The Plan does not prescribe definitive, substantive action to meet each element of the Recommendation. While a few specific proposed actions in the Plan may prove to be worthwhile, in total, the Plan relies far too heavily on the status quo and is not designed to achieve the substantial, far-reaching, broad improvements intended by the Board in its Recommendation. Members of the Board have already discussed these deficiencies with DOE's Acting Under Secretary, Thomas P. Grumbly, who initiated a process to correct the deficiencies while broadly addressing the training and qualification issue.

The Board agrees with your proposal to use the Implementation Plan for Recommendation 93-3, regarding improvements in the recruitment, assignment, training, and retention of DOE technical staff in defense nuclear programs, as an umbrella under which the training and qualification components of Recommendation 92-7 and other recommendations could be brought together. The Board understands that under the direction of the Acting Under Secretary, Thomas P. Grumbly, the Department intends to take timely action to improve the technical training and qualifications of DOE technical staff, and that the DOE does not intend to delay ongoing actions to meet the objectives and goals of 92-7 and other recommendations related to improving training and staff pending preparation and acceptance of the Implementation Plan for Recommendation 93-3.

The Board recognizes the importance of cooperation between its staff and members of your staff responsible for development of acceptable Implementation Plans for 93-3 and 92-7. To facilitate rapid development of such a Plan, the Board will make available a senior

member of its staff who will be responsible for directing a DNFSB working group which will provide guidance and assistance to the DOE's staff responsible for developing an Implementation Plan for 93-3, and incorporation of appropriate elements of 92-7 and other Board recommendations.

Sincerely,

  
John T. Conway  
Chairman

Copy to: T. Grumbly, EM-1  
M. Whitaker, DR-1