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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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October 4, 1995

The Honorable Thomas P. Grumbly
Assistant Secretary for Environmental Management
Department of Energy
Washington, D.C. 20585

Dear Mr. Grumbly:

The Defense Nuclear Facilities Safety Board (Board) acknowledges receipt of your seventh quarterly status report on the implementation of Board Recommendation 93-4. Through reviews conducted by the Board's staff and by the Department of Energy (DOE) Office of Environmental Management, Fernald Division (EM-423), the Board understands that the generic and Fernald-specific Technical Management Plans (TMP) are well received and are being successfully implemented at all Fernald projects. The Board also wishes to commend the DOE Fernald Area Office and the Fernald Environmental Restoration Management Company for the successful completion of Uranyl Nitrate Hexahydrate processing at Fernald on August 30, 1995.

The Board's staff also reviewed the implementation of the TMP at Hanford and found the effort there to be less than compliant with the implementation plan for the recommendation. The Board notes that this issue has been brought to your attention and is addressed in your status report.

The Implementation Plan for Recommendation 93-4 committed DOE to integrate the TMP concept with the activities of the 1993 Contract Reform Team and the Process Improvement Team (PIP) tasked with the revision of DOE Order 4700.1. Specifically with regard to the TMP process, the implementation plan committed DOE to "work with the teams to incorporate lessons learned from this process into their activities." The Board does not believe that this commitment has been fully met.

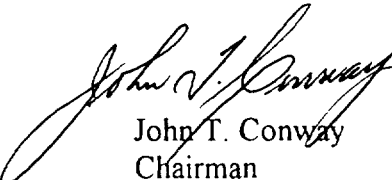
Although the generic TMP was submitted to the teams, little evidence exists within the Contract Reform Team report that would indicate a commitment to the TMP concept. Additionally, the generic TMP was submitted to the 4700.1 rewrite team. However, as you are aware, DOE Order 4700.1 was subsumed by the new Order on Life Cycle Asset Management (LCAM)--the scope of which is significantly different from that of 4700.1. Through discussions between DOE's staff and the Board's staff, a commitment has been made to include the identification of roles and responsibilities of key DOE project personnel in the new Order and its associated guidance.

This commitment is sufficient for technical management at a project level, but does not include all DOE responsibilities that are found in the TMP. Furthermore, the LCAM Order alone, does not appear to be the proper tool with which to impose, as a requirement, the implementation of the TMP concept into new contracts throughout the complex--a requirement suggested by Item 3 of Recommendation 93-4.

As a result of the apparent lack of implementation of Item 3 of the recommendation regarding the incorporation of the TMP concept into DOE's contracting mechanisms, further clarification within the implementation plan is necessary. Pursuant to 42 U.S.C. Section 2286b(d), the Board requests that DOE provide within 90 days:

1. A revision to the 93-4 Implementation Plan, including deliverables and milestone dates, that identifies the method by which the TMP concept will be incorporated into future DOE contracts.
2. A reconciliation of departmental efforts to define DOE responsibilities via the generic TMP, the Environmental Management Safety and Health Integrated Plan, the Manual of Functions, Assignments, and Responsibilities for Nuclear Safety and the Defense Programs Operations Manual. This effort should provide the basis for the development of a DOE-wide standards-based safety management plan--a plan that is not inconsistent with the TMP and may include the TMP.

Sincerely,



John T. Conway
Chairman

c: The Honorable Tara O'Toole
Mr. Mark Whitaker ✓