

**[DNFSB LETTERHEAD]**

September 12, 1995

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

Dear Secretary O'Leary:

The Board has received and reviewed the Department's [Implementation Plan dated July 21, 1995](#), for Board Recommendation 94-5, entitled "Integration of DOE Safety Rules, Orders, and Other Requirements." The Board notes that many of the key features the Board expected to be in the Implementation Plan will not be available from the Department until further plans and reports are completed some time in September or October 1995. Therefore, pursuant to the Board's Policy Statement No. 1, we will defer a determination on the adequacy of DOE's Implementation Plan until we have received the following key documents which DOE has scheduled for completion on the dates indicated:

- Memorandum on DOE Safety Requirements and Guidance. (September 15, 1995)
- Approved Department Standards Committee action plan that integrates and coordinates all standards activities, including DOE's use of the "necessary and sufficient" process to establish facility-specific nuclear safety requirements. (September 15, 1995)
- Policy Statement on procedures for developing, implementing and achieving compliance with nuclear safety requirements. (September 15, 1995)
- Final DOE Order 251.1 on the DOE Directive System to better explain the relationship between policy, requirements, guidance, technical standards, and implementation processes and expectations. (October 15, 1995)
- Approved Seminar Training and Communication Plan consistent with the DSC action plan. (October 30, 1995)
- Issuance of DOE Standard on Order Exemption Process (October 15, 1995)

If you have further questions, you may contact me or have your staff contact Mr. Robert M. Andersen, the General Counsel of the Board, at 202-208-6387.

Sincerely,

***John T. Conway***  
Chairman