



DEPARTMENT OF ENERGY

Washington, DC 20585

April 16, 1996

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW
Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

During the past several months our respective staffs have been engaged in a very positive and constructive review of the proposed nuclear safety management rule, 10 CFR 830. One of the important Defense Nuclear Facilities Safety Board staff comments pertains to whether the training accreditation program currently addressed by DOE Order 5480.18B, "Nuclear Facility Training Accreditation Program" should be included in the proposed rule, section 10 CFR 830.330, Training and Qualification. The Board staff has indicated (memorandum from T. Dwyer to L. Ettliger, dated December 20, 1995) that if the Department intends to discontinue this program, the Board should be formally notified to that effect.

I believe the Department has put into place a training and qualification program that achieves the objectives that the Defense Board seeks, but is more appropriate for our current operational activities. The Department's new requirements, processes, and methods ensure the adequacy of training programs at all of our facilities. The accreditation program, on the other hand, was limited to more complex nuclear facilities which at this time are few in number. Accordingly, the Department plans to discontinue the accreditation program because it is not appropriate for our current situation.

Enclosed is a staff paper which describes in detail the rationale behind this decision and the requirements and processes that have been put in place, partly in response to the Board's Recommendations 92-7 and 93-3, that I believe will accomplish the original goals of the accreditation program.

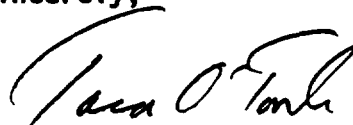
I recognize that regardless of any requirement, process, or method, the complete commitment of line management to successful implementation is essential to ensure adequate training. Program Secretarial Officers from the Offices of Environmental Management (EM), Defense Programs (DP), Energy Research (ER), Field Management (FM) and Nuclear Energy (NE) have concurred in the decision to discontinue the accreditation program. They have also committed to continue to pursue the implementation of existing DOE Order 5480.20A, "Personnel Selection, Qualification, and Training



Requirements for DOE Nuclear Facilities" and, when issued in the next few months, the proposed Training and Qualification rule and Implementation Guide. In addition, DOE-STD-1070-95, "Guidelines for the Evaluation of Nuclear Facility Training Programs" will be used for the evaluation of training programs at all departmental nuclear facilities. This standard contains the same objectives and criteria for training program evaluations as formerly contained in the training accreditation program standards and applies to the evaluation of all nuclear facility training programs.

The Department has faced an enormous challenge during the last several years to obtain and train skilled personnel. However, I believe we have put into place the mechanisms necessary to assure the adequacy of and accountability for training programs at all of our facilities. Much remains to be done and I will continue to place the utmost priority on the training and qualification of both departmental and operating contractor personnel.

Sincerely,



Tara O'Toole, M.D., M.P.H.
Assistant Secretary
Environment, Safety and Health

Enclosure

ENCLOSURE

DOE Order 5480.18A was first issued in 1989, and established an accreditation program modeled after the commercial nuclear industry. The program applied to DOE Category A reactors and major non-reactor nuclear facilities. The training programs that needed to be accredited were programs for operations, maintenance, and other selected technical support personnel. The fundamental objective of the program was to improve the quality of training programs through implementation of the Systematic Approach to Training (SAT) methodology at the nuclear facilities identified for accreditation. Since 1989, the Systematic Approach to Training methodology has been widely accepted, and even made a requirement through changes to DOE 5480.20A, "Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities." This latter Order applies to all DOE nuclear facility training programs.

Since 1989, the number of major DOE operating nuclear facilities subject to accreditation has declined (from 50 to 12) because of mission changes and cessation of operations. It is expected that additional facilities will be shutdown over the next several years. Thus it became less cost-effective to administer the very formal accreditation process (e.g., evaluation reports, review teams, Accreditation Boards, maintenance reports, etc.) for the remaining operating facilities. In developing the Action Plan for Recommendation 93-3, it was recognized that the SAT methodology and alternative processes to evaluate the adequacy of training programs at all nuclear facilities were increasingly necessary. It was also recognized that more responsibility and accountability needed to be placed on DOE personnel for the evaluation of training programs and that significant improvements in departmental staff capabilities were needed to accomplish this objective.

The following are some of the more significant changes implemented by the Department in the last several years in an effort to provide a much broader application of the SAT methodology and the evaluation of training programs. Collectively, these changes extend the underlying goals of the accreditation program to all nuclear facility training programs.

- The Systematic Approach to Training methodology was made a requirement for all nuclear facilities in DOE 5480.20A, issued on November 15, 1994. This fundamental requirement will be maintained in the proposed rule, section 10 CFR 830.330.
- A departmental standard for the evaluation of training programs was developed and issued in June 1994 (DOE-STD-1070-94, Guidelines for Evaluation of Nuclear Facility Training Programs). The use of this standard was made mandatory in DOE 5480.20A and will be continued as evaluation standards in the implementation of 10 CFR 830.330. Notably, the evaluation standards are identical to those used in the accreditation program.
- Each Operations Office has established a training office or division that has been charged with the responsibility to support DOE line management in the evaluation of contractor training programs. This is also a commitment in the 93-3 Action Plan. This places direct

accountability on DOE personnel. In the past, this infrastructure did not exist in DOE and reliance on contracted support for accreditation was necessary.

- The Office of the Deputy Assistant Secretary for Oversight (EH-2) also formally evaluates training programs as an integral part of its oversight program.
- A DOE Technical Qualification program has been established. This program includes a specific qualification standard for DOE personnel who evaluate contractor training programs. This will provide assurance of DOE technical capability to carry out the evaluation process.
- The revised DOE Order 5480.20A establishes requirements for all of the Department's nuclear facilities that will continue to meet or exceed Nuclear Regulatory Commission and industry standards for comparable facilities. These requirements have been incorporated in the proposed training and qualification rule and associated Implementation Guide.
- Training Assistance Programs were established to help Operations Offices and operating contractors develop quality training programs for operating organization personnel.
- As part of the Department's Technical Standards Program, over forty (40) standards and handbooks addressing the Systematic Approach to Training methodology, fundamentals training, training program evaluation, and training program content guidelines for various facility positions have been developed.
- To improve worker safety programs during the extensive environmental restoration and cleanup activities, standardized training programs in the areas of radiation protection and hazardous waste operations are being implemented.

These initiatives will result in significant improvements to training programs and an improved internal capability to evaluate their effectiveness. The following are a few of the benefits that are being achieved by the actions that have been implemented to date:

- More direct responsibility and accountability for training program evaluation with DOE management;
- Strengthened performance-based enhancements of training and qualification programs through broader application of the systematic approach to training for all nuclear facilities;
- Increased availability of highly knowledgeable DOE evaluators;
- Reduction of reliance on contractor support;
- Provision for independent and more consistent oversight;

- Reduction of redundant appraisal and assessment efforts;
- Improvement in the scheduling of program evaluations, resulting in more efficient use of DOE and operating contractor resources; and
- Improvement in the day-to-day knowledge and awareness of operating contractor training and qualification programs by DOE.

During the past several years the Department's strategic alignment efforts have sought better ways to re-engineer many processes, that while workable in the past, did not necessarily result in the most efficient and effective utilization of decreasing resources. Nor did many of the past practices meet the changing missions of many nuclear facilities. Taken as a whole, the requirements, processes, and methods the Department has put in place extend the original goal of the former accreditation process and its best features to all nuclear facilities. It is fully recognized that irrespective of any processes or methods that are put into place, the commitment of line management is essential for successful implementation.