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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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July 22, 1996

The Honorable Hazel R. O'Leary
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary O'Leary:

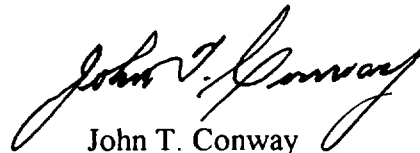
Mr. Donald W. Pearman, Jr., Associate Deputy Secretary for Field Management, in a letter to the Defense Nuclear Facilities Safety Board (Board) dated April 15, 1996, suggested closure of Board Recommendation 92-2 regarding the Facility Representative Program at the Department of Energy (DOE). Subsequently, the Board and its staff conducted a detailed review of outstanding issues under that Recommendation, DOE progress in completing implementation of the Recommendation, and the latest report transmitted with Mr. Pearman's letter which addresses program implementation, training issues, and other initiatives. Based on these reviews, the Board has determined that Recommendation 92-2 should not be closed at this time.

The Board recognizes, however, that DOE has made substantial progress in its Facility Representative Program since issuance of the Recommendation. The Department analyzed the existing Facility Representative Program within the defense nuclear complex and used that information to develop a program standard, DOE-STD-1063-93, *Establishing and Maintaining a Facility Representative Program at DOE Nuclear Facilities*. Headquarters then directed benchmark assessments against the standard and endeavored to develop a focused performance indicator system for evaluating the Facility Representative Program. DOE enhanced communication among the sites and instituted annual conferences for both Facility Representatives and Facility Representative Program Managers which resulted in fruitful exchanges of lessons learned throughout the complex. Though the quality of individual site's Facility Representative Program remains variable, improvement has been noted in almost all cases.

While DOE has made significant progress in developing the Facility Representative Program, a number of issues merit further management attention. As stated previously, the Board has observed that implementation and administration of the DOE Facility Representative Program varies significantly across the complex. DOE's standard for the program has been used to good effect in initiating the program, but DOE should update the standard to reflect three years of lessons learned. Among the issues which DOE management should address are qualifications for acting/interim Facility Representatives, effective Facility Representative career planning, and optimal recruitment of Facility Representatives.

In its response to 92-2, as well as in DOE Orders covering Conduct of Operations and Occurrence Reporting, DOE has acknowledged that Facility Representatives are the "primary point of contact with the contractor" and thus are key links in the chain of safety personnel at defense nuclear facilities. The Board agrees. Therefore, the Board requests that Mr. Pearman, in his role as the assigned lead for this program, brief the Board on the status of the Facility Representative Program and discuss with us plans for closure of open issues and the future of the program. We look forward to meeting with Mr. Pearman on this important safety program.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Conway". The signature is written in a cursive, flowing style.

John T. Conway
Chairman

c: Mr. Donald W. Pearman, Jr.
✓Mr. Mark B. Whitaker, Jr.